

**UNITY**  
CONSULTING & INNOVATION

## Code of Conduct

# Code of Conduct

**UNITY** is the management consultancy for innovation and digital transformation. We enable global players and medium-sized companies in the private and public sectors to master digital change. UNITY is a member of the UNITY Innovation Alliance AG. This strong group of companies supports its clients in the digitalization of business models, products and services with end-to-end expertise – from the conception to the implementation.

We are fully aware of our responsibility towards our customers, shareholders, employees and the organizations in which we operate. This is documented in our strategy, whose goals and basic values guide our actions, and is specified in this UNITY Code of Conduct. In addition, we are committed to the United Nations Global Compact and have committed ourselves to the ten basic principles.

As a common guideline for our decisions and actions, the Code of Conduct specifies binding minimum standards for responsible conduct towards our business partners and the public, as well as for our conduct within the company. By raising awareness of legal risks, it helps to avoid violations of the law. All of us – employees, Management Board and Supervisory Board – are obliged to comply with the principles that are defined here.

According to this guideline, responsible and lawful conduct is an integral part of our company. We challenge and encourage our employees to comply with it. To this end, we have implemented an appropriate management system in our company.

UNITY AG lives diversity and equal opportunities. If the masculine form is used in our texts, this is only for better readability. All personal designations apply equally to all gender identities.

# Compliance with Internationally Recognized Human Rights

## Human Rights

We are committed to respecting and upholding internationally recognized human rights, including the prevention of forced or involuntary labor, including modern forms of slavery and human trafficking, including in the supply chain. We recognize the rights of local communities, minorities, indigenous peoples and other vulnerable groups and strive to avoid negative impacts on them. We respect the personal dignity, privacy and personal rights of every individual. We create fair working conditions for our employees that, as a minimum, comply with applicable laws and are based on the core labor standards of the ILO. We guarantee our employees who are deployed within the framework of service and work contracts an appropriate living or housing situation in the respective country of employment. We recognize the right of all employees to form trade unions and employee representative bodies on a democratic basis within the framework of national regulations. We are committed to respecting the right to freedom of association, including collective bargaining.

## Equal opportunities and equal treatment

We guarantee equal opportunities in employment, do not tolerate any form of discrimination and promote respectful cooperation, diversity and tolerance. The personal dignity, privacy and personal rights of each individual must be respected. Employees must not be subjected to corporal punishment or physical, sexual, psychological or verbal harassment or abuse. All employees, regardless of ethnic or national origin, gender, religion, ideology, age, disability, sexual orientation, skin color, political views, social background or other characteristics protected by law, must be treated strictly according to their abilities and qualifications in all employment decisions – including, but not limited to, hiring, promotion, compensation, benefits, training, dismissal and termination.



**Protection against child labor**

We respect the right of children to development and education. We ensure that the legal minimum age for employment is observed. In particular, our suppliers undertake to comply with local laws and the ILO Minimum Age Convention. According to this, no children under the age of 15 may work directly or indirectly, unless an exemption applies in accordance with the ILO. Furthermore, employees under the age of 18 may not carry out hazardous work and must be excluded from night work, taking into account educational needs.

**Conflicts of interest**

We decide exclusively on the basis of objective criteria. Private interests and/or personal advantages are not allowed to influence business decisions. In one's private life, business relationships with our business partners must be avoided if this could lead to a conflict of interest. In particular, we must refrain from privately contracting our business partners, if and to the extent that this could constitute granting and/or accepting an advantage. Employees who are related to business partners are not authorized to issue orders, approvals or similar to such business partners without prior consultation and in compliance with the dual control (four-eyes) principle.



# Compliance with legal standards

## Compliance with and promotion of business ethics

We reject unethical or illegal business practices under all circumstances and undertake to comply with the applicable laws and regulations of the countries in which they do business, e.g. the US Foreign Corrupt Practices Act and the UK Bribery Act. We expect the highest level of integrity from our suppliers in all business activities and relationships. All forms of corruption, bribery, extortion and embezzlement are strictly prohibited, and this applies to both active and passive bribery. We ensure that no improper benefits or advantages (e.g. gifts, invitations, donations or sponsorship commitments) are made in business dealings with customers, public officials or other third parties.

We require our employees to comply with these requirements, particularly with regard to the prevention of corruption and fraud, antitrust matters, tax regulations, data protection and export controls. The topic of compliance is therefore an elementary component of their daily activities. We have established the internal rule that decisions that could have a significant legal, economic or factual impact require the involvement of at least two responsible employees ("dual control principle"). If necessary, they will involve the management in accordance with their risk management.

## Occupational health and safety

We take the responsibility for the health and safety of our employees very seriously. The health and safety of our employees is a corporate objective of equal importance to the quality of our services and economic success. We strive to implement occupational health and safety at a high level.

We comply with the applicable occupational health and safety regulations and ensure a safe and healthy working environment in order to maintain the health of our employees and prevent accidents, injuries and work-related illnesses. Hazards must be eliminated at source.

We undertake to comply with occupational health and safety regulations and strive to promote occupational health in order to continuously improve working conditions.

## Appropriate remuneration, work-life balance and social benefits

The personal well-being of our employees is paramount. We pay good, industry-standard salaries. We encourage and demand personal responsibility from our employees. We create attractive long-term jobs for our employees,



as well as opportunities for development, organization and advancement. This includes ensuring a balance between career, family and personality (work-life balance). Working hours comply at least with the applicable laws or industry standards of the respective national economic sectors. The ILO Convention on the Limitation of Working Hours and Rest Periods must be observed throughout as a minimum standard. Furthermore, strict attention is paid to ensuring that the other contractors commissioned by us comply with the legal obligations.

### **Confidential information and data protection**

We take the necessary steps to appropriately protect confidential information and business documents from being accessed and viewed by colleagues and other third parties who are not involved.

We comply with the existing legal regulations for maintaining confidentiality, in particular the General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG) and the Trade Secrets Act (GeschGehG). Data is only collected, recorded, processed and used in accordance with legal requirements. The protection of personal data, in particular of employees, customers and suppliers, is of particular importance to us. No personal data may

be collected or processed without legal permission or the consent of the person concerned.

We observe strict principles with regard to the processing of personal data and have therefore implemented formal obligations and guidelines as well as strict organizational and security measures to ensure a high level of protection for this data.

In light of this, we have completed both ISO certification in accordance with 27001 and TISAX certification.

### **Use of artificial intelligence**

We recognize the importance and potential of artificial intelligence (AI). We are committed to using AI responsibly and ethically to promote innovation. The use of AI must be transparent, fair and in line with applicable data protection regulations. We are committed to protecting privacy and ensuring that AI technologies do not make discriminatory or biased decisions. Our responsibility includes continuously reviewing and adapting our AI practices to current ethical guidelines and standards.



### **Environmental protection**

Sustainable environmental and climate protection and resource efficiency are important corporate goals for us. We undertake to comply with the environmental protection regulations and standards applicable to their business activities and to act in an environmentally conscious manner at all locations where they operate. The environmental impact should be minimized and environmental protection continuously improved.

We ensure compliance with the applicable environmental and energy laws as well as regulations and directives, such as the REACH Regulation, EMC Directive, RoHS Directive and WEEE Directive, as amended. Furthermore, they use natural resources sparingly, minimize environmental pollution and continuously improve environmental protection. Our suppliers pay attention to the environmental compatibility of their activities in order to make a contribution to reducing emissions and energy and water consumption.

As a minimum, we comply with the emission and wastewater limits and cleaning requirements that apply to their activities. They also ensure compliance with waste legislation. They avoid waste and recycle it in accordance with the law and to the highest possible quality. If necessary, they implement waste management concepts for high-quality material waste separation at the point of origin and ensure compliance with legal requirements for the storage and handling of hazardous substances.

As part of necessary risk analyses, substitution options are examined and protective measures are taken for employees and the environment. Environmental and energy issues are taken into account at an early stage in relevant business processes and decisions (e.g., investments, planning of new buildings and facilities).



## Contractual obligations

### **Compliance with the regulations**

Compliance with the requirements formulated in this document is an essential basis for our joint actions and should be reflected in our conduct under all circumstances.

Our employees can report well-founded suspicions of potential breaches of our Code of Conduct to managers at any time. In addition, our employees have access to a whistleblower system via our integrated management system. Every report is processed confidentially, neutrally and fairly. Any breaches of rules identified are rectified promptly and appropriate measures are taken.

### **Contact**

For further questions about the Code of Conduct of UNITY AG or other areas, all employees and third parties (customers, suppliers, etc.) can use the central e-mail address **[compliance@unity.de](mailto:compliance@unity.de)**.

# UNITY

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