

Code of Conduct for Lawful and Responsible Corporate Conduct at EVS Translations

Preamble

Responsible and lawful conduct is firmly established at EVS Translations. EVS Translations is committed to the ten principles of the United Nations Global Compact.

This Code of Conduct deals with compliance with the applicable legislation. It shows each employee the range and emphasis of the legal framework conditions that are relevant to EVS Translations and clarifies their absolute binding nature.

It is therefore essential that all employees know the relevant legal obligations and firmly commit to fulfilling them.

Anyone who breaches the Code of Conduct can expect appropriate consequences, ranging from disciplinary action to civil and criminal sanctions, depending on the severity of the breach.

Legal violations can also result in fines, compensation claims, and reputational damage.

The management's aim is to comply with ethical standards and create a working environment that promotes integrity, respect, and fair conduct. A corporate policy that strictly abides by the law and conventions serves the long-term interests of the company.

This Code of Conduct has been established and approved by the Managing Director of EVS Translations. It applies to all branches of the company worldwide.

1. Compliance with Applicable Laws – Respect for Human Rights

In all business decisions and actions, EVS Translations must follow the applicable laws and other relevant provisions, both nationally and abroad.

Respect for human rights is an integral part of the corporate responsibility of EVS Translations. The dignity and personal rights of individual employees or colleagues, as well as third parties, are respected and observed.

Integrity and honesty require fair competition, also in relation to our clients and suppliers.

In this regard, all employees are obliged to comply with all applicable legal regulations and internal company regulations.

In case of any concern that regulations are not being complied with, the relevant manager must be notified accordingly.

2. Respectful Internal and External Interaction

EVS Translations promotes an appreciative attitude, an open and honest approach, and mutual respect in dealings with internal and external parties. It aims to offer all employees challenging and satisfying opportunities for professional and personal development.

It explicitly stands up for a ban on discrimination, especially on the basis of race or ethnic origin, sex, religion or world view, disability, age, sexual identity, harassment of any kind, and discrimination. Employees are selected, employed, and promoted on the basis of their abilities and qualifications.

If violations of this equal-treatment principle are observed, the incident must be reported to the HR department.

3. Fair Competition and Integrity

EVS Translations strives to conduct its business in a competent and ethical manner, and to protect fair competition in all markets in which the company is active by complying with the applicable laws regarding bans on cartels, competition, and restrictions on competition. Unfair advantages in relation to customers, suppliers, or competitors must be avoided. Employees of EVS Translations are expected not to involve themselves in arrangements or agreements with other companies relating to competition and antitrust laws.

Within the company, EVS Translations ensures that the employees are informed about all important matters in good time. The aim is to strengthen the employees' identification with and loyalty to the company, and to foster collaboration and a trusting and open attitude. EVS Translations also sees it as its duty to regularly and fairly assess the employees and to challenge and support them.

EVS Translations maintains business relationships with third parties that follow ethical business practices in accordance with legislation, and compliance with the provisions of the Code of Conduct contained herein is essential for the business relationship. The Code of Conduct is recognized by business partners and agreed with them. Compliance with the Code of Conduct can be checked by EVS Translations in an appropriate manner.

EVS Translations does not involve itself in any activities related to money laundering, nor does EVS Translations enable or tolerate these.

EVS Translations immediately assigns incoming payments to the corresponding services in order to ensure an open and transparent cash flow.

4. Employee Obligations

4.1. Avoiding Conflicts of Interest

EVS Translations expects its own employees to be loyal to the company.

All employees must avoid situations in which their personal or financial interests come into conflict with those of EVS Translations. It is therefore especially prohibited to be involved with competitors, suppliers, or clients, or to enter into private business relationships with them if this could lead to a conflict of interest. The interests of EVS Translations must not be harmed by conflict situations.

Employees should not indirectly and/or directly gain personal advantages as a result of their position in the company and access to confidential information. All employees are obliged to promote the legitimate interests of EVS Translations as much as possible. Any situation of competition with the company must be avoided.

Every actual or possible conflict of interest must be reported and discussed with the relevant manager or compliance officer. Transparent disclosure of the conflict is essential.

4.2. Ban on Corruption, Acceptance of Advantages

EVS Translations is against corruption – especially passive bribery, bribery, and the acceptance or granting of undue advantages. Methods of doing business by unfair means will not be tolerated.

Therefore, no employee can accept benefits or advantages from business partners in any form if it is reasonable to assume that they will influence business decisions or transactions of EVS Translations or could even just appear to do so. Small gifts of low value are excepted from this. Invitations must remain within the boundaries of normal business hospitality.

Contact with officials and agents must strictly adhere to the laws and regulations.

The giving and accepting of gifts, invitations, or any other form of benefits can influence the independence of the decisions or the decisions of the business partners.

Any signs of corruption are reported immediately to the relevant persons.

4.3. Ban on Insider Trading

All employees of EVS Translations are obliged to follow the insider rules of the Securities Trading Act and especially the ban on insider trading. This applies in particular to employees with access to non-public information about a company that EVS Translations does business with.

Such insider information includes, for example, business transactions, significant contracts, business relations, financial information, significant legal disputes, or similar.

If an employee of EVS Translations gains knowledge of information that a reasonable investor would consider significant in an investment decision, said employee must not share said insider information with other persons until the information is made public. The use of significant, non-public information can represent a legal violation.

4.4. Fair Working Conditions, Environment

All employees of EVS Translations must maintain a safe and healthy environment. Safety regulations and practices must therefore be strictly followed.

As a socially responsible employer, EVS Translations considers its employees to be a very valuable asset. It requires great commitment from its employees and in return shares the success of the business with them. The HR policy of EVS Translations contributes to offering employees the opportunity of professional and personal development. Open exchange of opinions, criticism, and ideas are encouraged.

EVS Translations recognizes the employee's entitlement to appropriate remuneration and complies with the statutory minimum wage regulations in the relevant labor markets.

EVS Translations condemns discrimination, bullying, or harassment of any kind in the workplace. Any form of forced labor or child labor is strictly rejected.

Protection of the environment and resources and the prevention of waste are major priorities. EVS Translations fulfills the applicable environmental protection requirements. Irregularities are dealt with immediately.

EVS Translations aims to protect resources and lower the consumption of energy, water, raw materials, and consumables. Every employee is jointly responsible for reducing the consumption of these.

4.5. Handling Internal Knowledge

All employees of EVS Translations are obliged to ensure the fast and smooth exchange of information within the company. Information must be accurately and completely transmitted to the relevant areas unless other interests take priority in exceptional cases – especially on the basis of confidentiality obligations. Relevant knowledge must not be unlawfully withheld, falsified, or selectively transmitted.

Dishonest reporting within the company or to organizations or persons outside of the company is strictly prohibited. All annual financial statements and annual reports, business papers and accounts of EVS Translations must accurately portray business events and transactions, and comply with the legal requirements and accounting principles, as well as the internal accounting procedures of EVS Translations.

4.6. Handling Assets

All employees of EVS Translations are responsible for handling the company's property in a careful and correct manner. Every employee is obliged to protect the property of EVS Translations against loss, damage, misuse, theft, misappropriation, or destruction. Every employee is obliged to inform their manager immediately if assets are used in a way that conflicts with the above.

5. Secrecy, Data Protection, and IT Security

A large part of the business information of EVS Translations is secret, confidential, or legally protected, resulting in an obligation to maintain secrecy. This does not apply if publication of the information was approved by EVS Translations or is mandatory based on laws or regulations.

The obligation to maintain secrecy applies to comprehensive trade secrets. This includes trade secrets, business and marketing plans, drafts, business papers, salary details, and all other unpublished financial data and reports. The unauthorized transmission of this kind of knowledge can cause major damage to the company.

The intellectual property of competitors, business partners, and other third parties is also recognized and observed.

Protecting the personal data of employees and business partners is very important to EVS Translations.

All personal information about employees, clients, business partners, and suppliers, as well as other third parties, is treated carefully and confidentially at EVS Translations, in full compliance with data protection laws – in particular, the General Data Protection Regulation. In principle, processing is subject to the consent of the person concerned, a contractual basis, or another legal basis.

This information must be protected with great care. The checks and processes implemented within EVS Translations ensure the best possible protection of all personal data and confidential information.

The business activity of EVS Translations is largely dependent on the functioning of the IT systems. Ensuring that the IT systems are functioning is therefore a top priority.

6. Implementation and Monitoring

The rules set out in this Code of Conduct are a key element of the business culture of EVS Translations. Uniform compliance with these principles is essential. Every employee is responsible for this.

If an employee has concerns or complaints about the points set out in this Code of Conduct, or is aware of a potential breach of the conduct guidelines contained herein, they must submit these to their direct manager, the compliance officer, the HR department, or the legal department for consideration. This can also be done anonymously or confidentially. If an employee is not satisfied with the investigation, they can submit the matter to the next level of authority. EVS Translations does not allow any reprisals on the basis of complaints made in good faith in the context of this Code of Conduct.

7. Responsibility

All employees of EVS Translations are bound by the rules of this Code of Conduct. Violations of this Code of Conduct will always result in consequences, culminating in legal measures to end the employment relationship. EVS Translations also reserves the right to initiate prosecution, where this is called for.

To a significant extent, EVS Translations works with service providers who, in the context of their commission, act on behalf of EVS Translations and gain access to data that needs to be protected. EVS Translations therefore considers itself responsible for referring contractually-bound service providers to the company's Code of Conduct and striving for compliance with the guiding principles contained herein.

Offenbach, May 2018



Edward Vick

The Managing Director