

# Retarus Code of Conduct



## 1. Introduction

Retarus and its affiliated companies (“Retarus”) are committed to conduct their business in an ethical, legal and socially responsible manner. Retarus provides a safe and ethical working environment for all its employees and partners and ensures that they are treated with respect and dignity.

This Code of Conduct (“COC”) is a binding guideline on ethical, social and legal behavior for all personnel, regardless whether tasks are performed as permanent employees, freelancers, temporary workers, or otherwise (“Staff” or “we”).

This COC, in addition to applicable laws, regulations, provisions and guidelines, specifies the minimum standards expected of all Staff. This COC is supplemented by a comprehensive list of detailed internal policies e.g. on information security, data protection, office conduct, etc. Furthermore, we encourage Staff to live up to both international and industry best practices.

## 2. Law and Ethical Standards

Retarus is committed to compliance with all applicable laws and regulations as well as this COC, including when our COC sets a higher standard than, but does not conflict with, legal requirements. We adhere to the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, the UN Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises as well as the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practice in particular, without limitation, as set forth below.

## 3. Human Rights and Fair Labor Practices

Retarus complies with all applicable laws and mandatory industry standards regarding minimum wage, working hours, including overtime, rest breaks and paid vacation.

Retarus promotes an inclusive work environment and values the diversity of its employees. We are committed to equal opportunities, do not discriminate, and do not tolerate discrimination or harassment with respect to gender, ethnic and national origin, race, color, religion, age, disability, sexual orientation and identity, or any other characteristic protected by law.

Staff is free to join or not to join a union/employee representation of their choice, free from threat or intimidation. Retarus recognizes and respects the right to collective bargaining in accordance with applicable local laws.

## 4. Health & Safety

Retarus has implemented occupational health and safety management at a high level appropriate for our business. We comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health and safety of employees, safeguards third parties and prevents accidents, injuries and work-related illnesses. This includes regular workplace risk assessments, trainings in health and safety issues and the implementation of adequate hazard control and precautionary measures.

## 5. Data Protection, Information Security, and Disclosure of Information

We strictly comply with applicable data protection laws, e.g. GDPR, in particular with regard to personal data of customers, consumers, and employees. We comply with all statutory and contractual requirements on data protection and information security when data is collected, recorded, hosted, processed,

transmitted, used or erased. We will not disclose any data and information which has been gained through our business relationships or affiliations that is not known to the general public

In particular, we acknowledge the obligation to protect the confidentiality, integrity and availability of information and data made available to us. Staff shall handle and safeguard our customers' and Retarus' information and data, especially business / trade secrets and intellectual property regardless of their commercial value, with utmost care, use it only for the purpose it was provided, and protect it from disclosure and other infringements. Data privacy and data security trainings offered by Retarus are mandatory for all Staff.

## 6. Bribery and Corruption, Money Laundering

Retarus firmly rejects any and all forms of corrupt behavior. Staff must comply with all applicable national and international anti-corruption laws and regulations. Staff must not participate in extortion, bribes, kick-backs and facilitation payments of any kind, whether in dealings with public officials or individuals in the private sector and shall not (neither directly nor indirectly) offer, provide or accept anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business.

Retarus does not condone any form of fraud or asset-damaging offences including but not limited to embezzlement, theft, or tax evasion, regardless of whether Retarus or third-party assets are affected. Retarus maintains policies and procedures to prevent money-laundering activities within its sphere of influence, to ensure compliance with applicable laws and regulations designed to combat money laundering activities. Retarus maintains financial records and reports according to applicable laws and regulations to demonstrate compliance.

## 7. Trade Regulation & Free Competition

Retarus complies with all applicable competition, anti-trust, export control, trade law, sanctions and customs laws and regulations, including prohibitions & restrictions. Our beneficial owner(s), personnel, agents and any other subcontractors, consultants or suppliers used by Retarus are not listed on any applicable denied party sanctions lists.

## 8. Conflicts of Interest

A conflict of interest is any personal or financial interest, any business or personal activity or relationship, prior or current employment, or any obligation that may interfere with the ability to objectively perform job duties and responsibilities or impair independence and objectivity. Such conflict of interest situations include critical relationships such as a relationship by blood or marriage, partnership, participation or an investment in business partners or competitors. Staff shall immediately disclose any actual or potential conflict of interest related to its activities to enable the resolution of such conflict of interest.

## 9. Environment

As it is Retarus' goal to minimize the environmental impact of our business activities, we support and prefer IT systems and solutions that help to reduce environmental impact. Retarus complies with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment. We take the environmental impact into consideration in our operations, for example by setting and monitoring climate protection goals for ourselves and report relevant data on environmental and climate protection upon request. Since 2007, a green IT policy has consistently been implemented at Retarus' data centers by means of hydroelectric power and effective energy management.

Retarus complies with all applicable laws and resulting due diligence obligations with respect to the sourcing of minerals and materials from conflict affected regions and high-risk areas, which may contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

## 10. Business Continuity Planning

Retarus is prepared for any disruptions of its business (e.g. natural disasters, terrorism, supply chain disruptions, communicable disease outbreaks, epidemics or pandemics, information security issues, cyber-attacks). This preparedness includes business continuity plans that protect customers, employees as well as the environment from the effects of possible serious disruptions that may arise within the domain of our operations.

## 11. Implementation of the COC

Staff is obliged to comply with this COC. This also means that Staff shall make an ongoing effort to learn about subject matter relevant to their duties, including but not limited to applicable guidelines and policies as well as any changes, updates and amendments. This COC does not reiterate or reference existing regulations, for example the Retarus policies. The terms and guidelines provided therein shall continue to apply in addition to this COC.

Employees may address questions regarding this COC to their supervisor or HR at any time. Any (potential) infringements of this COC or applicable national or European law or indications of risks of infringement shall be reported immediately to a supervisor, the HR department or management. In addition, a digital “Messaging Box” available on the intranet can be used to send anonymous emails to HR. All information submitted is treated confidentially; employees who report a (potential) infringement in good faith have no disadvantages to fear. If necessary, employees can request a (confidential) meeting with HR. HR is responsible for following up on the information provided and initiating appropriate sanctions in the event of infringements.

Retarus regularly monitors, reviews and verifies compliance with the requirements of this COC. Therefore, we maintain documentation necessary to demonstrate compliance with this COC.

We strive for continuous improvement, such as setting measurable targets on reducing environmental impact, enhancing working conditions or diversity, and sustainability.

This COC reflects Retarus’ values and commitment to its customers, the communities which we serve and the protection of the environment. We will not tolerate any infringements of this Code of Conduct. Without prejudice to any other available remedies, in case of any uncured failure to comply with the requirements of this COC, Retarus reserves the right to disciplinary actions. Depending on the type and severity of the infringement, such actions may include work instructions, warning notices and even termination of the employment relationship.