



CODE OF CONDUCT
for Business Partners
of Haufe Group SE

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Content

Introduction/Preamble	3
How the Code of Conduct Applies to Haufe Business Partners	4
1. General Principles	5
2. Legal Compliance	6
2.1 Integrity / Anti-Corruption / Gifts and Invitations	6
2.2 Fair Competition / Antitrust Law / Sponsorship	6
2.3 Prevention of Money Laundering	7
2.4 Foreign Trade Legislation	7
3. Human Rights and Working Conditions	8
4. Conflicts of Interest	9
5. Data Privacy	10
6. Environmental Protection	11
7. Duties Related to Records and Archiving	12
8. Fulfilment and Possible Consequences	13

Introduction / Preamble



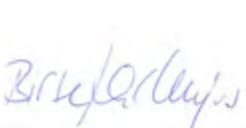
Haufe Group SE is a leading provider of integrated business and workstation solutions that combine content, technology, and ongoing training to support companies in achieving sustainable growth and designing transformation processes in line with their particular needs.

As a family-run organisation, Haufe Group SE and its subsidiaries (referred to hereafter as “Haufe Group”) uphold a common system of values across all their business divisions, functional realms, and product areas. These values include setting an example by thinking and acting with an eye on the long term and demonstrating a commitment to sustainability both internally and externally, as well as in connection with customers, society, and the environment. Since its foundation, making positive contributions, identifying risks early on, and taking an active role in shaping the future have also been an integral part of Haufe Group’s DNA. More important than any legal requirements in this regard is the group’s own vision of how it wants to operate, which is rooted in a corporate culture of sound values and norms that provide a clear, contemporary framework for its actions.

This consistent understanding of responsible and ethical behaviour is reflected in all the operational processes at Haufe Group. From the initial idea for a new product to all the steps in its development, its eventual sale to the customer and beyond, the group does its best to ensure fair, sustainable business practices that provide equal opportunity to all.

The Code of Conduct for Business Partners of Haufe Group SE covers important ethical, ecological, and social aspects that are founded on principles of internationally recognised standards regarding responsible business management. These include the United Nations Global Compact, the social and work-related standards of the International Labor Organization (ILO), and the principles established for multinational companies by the Organisation for Economic Co-operation and Development (OECD).

To ensure that these values are also upheld in an efficient manner outside of its own organization, Haufe Group’s Code of Conduct stipulates mandatory standards for its relationships with business partners. Stability and ongoing development are key to fair and sustainable business operations that ensure equal opportunity. The overarching aim of this Code of Conduct is to prevent situations that could call into question the integrity of employees of Haufe Group or its business partners based on their actions. The Code of Conduct therefore seeks to establish basic principles that will ensure legal compliance, the preservation of human rights, and respect for environmental concerns in any and all business dealings involving Haufe Group.


Birte Hackenjos


Harald Wagner

How the Code of Conduct applies to Haufe Business Partners

All business partners of Haufe Group are to ensure compliance with the principles and expectations laid out in the Code of Conduct for Business Partners of Haufe Group.

Within the meaning of this document, a “business partner” is any third party (including both individuals and legal entities) that acts for, on behalf of, or in cooperation with Haufe Group and has some form of business- or customer-related contact with Haufe Group. This includes any subcontractors engaged by a given third party in connection with its business relationship with Haufe Group. In particular, business partners include suppliers, subcontractors, distribution partners, consultants, brokers, authors, sales representatives, instructors, and freelance employees.



1. General Principles

Business partners of Haufe Group are hereby required to:

- Carry out their business practices with integrity, meaning in a responsible manner that complies with all the relevant rules and ethical principles
- Follow all the relevant laws and, at minimum, the principles specified herein
- Make every appropriate effort to ensure that their employees and subcontractors are aware of and compliant with said principles



2. Legal Compliance

Haufe Group requires all its business partners to follow the relevant laws at the local, national, and international levels. They must also be aware of all the basic requirements, legal specifications, and guidelines that apply to the activities they perform for, on behalf of, or in cooperation with Haufe Group

In any and all cases in which a particular business area, market, or country is subject to laws or requirements that are stricter than the principles described in this Code of Conduct, those laws or requirements apply

2.1 Integrity / Anti-Corruption / Gifts and Invitations

Haufe Group repudiates any and all forms of corruption, theft, misappropriation, and bribery and thus requires its business partners to ensure their compliance with the anti-corruption legislation that has been established at the national and international levels.

Any type of corruption, be it active or passive, is prohibited. This includes any form of consideration that is intended to influence decision-making in an improper manner. Furthermore, Haufe Group's business partners also hereby pledge to refuse (and never offer) bribes, kickbacks, or any other type of illegal payments, trips, gifts, entertainment, favors, or incentives. In particular, "facilitation payments" and any other benefits offered to individuals, businesses, or government officials will not be tolerated.

Haufe Group's business partners are to accept gifts and invitations only when they are appropriate and not extended in expectation of some manner of return consideration. In addition, such gifts and invitations must not violate any relevant laws or result in the giver receiving preference in an impermissible manner (in advance of a contract being signed, for example). In this context, particular attention should be paid to the compliance regulations on how organizations are to deal with the considerations they receive.

2.2 Fair Competition / Antitrust Law / Sponsorship

Haufe Group's business partners are to support the fight against money laundering, tax evasion, fraud, and other crimes to the best of their ability.

In all their business relationships, they are to follow the laws and rules of free and fair competition and ensure their compliance with antitrust legislation. In particular, Haufe Group's business partners are to refrain from participating in arrangements with competitors that violate antitrust law and from exploiting any position of dominance in their respective markets.

Any sponsorship activities involving Haufe Group's business partners must be transparent and compatible with the relevant laws. They may not be used as a means of gaining improper advantages, be they direct or indirect in nature. The services rendered by the sponsoring party based on a corresponding contract must be commensu-



rate to the benefits provided by the sponsored party and primarily intended to achieve the sponsoring party's marketing and corporate communication objectives.

2.3 Prevention of Money Laundering

All business partners of Haufe Group hereby guarantee that they are in full compliance with all laws regarding the prevention of money laundering and are in no way involved in such activities.

2.4 Foreign Trade Legislation

National and international laws and regulations are in place that govern the import, export, and domestic trade in goods, services, and technologies, as well as payment transactions and the flow of capital.

Haufe Group's business partners must ensure their compliance with the specifications of such foreign trade legislation. Furthermore, they are to implement appropriate measures to prevent violations of current economic embargoes; the requirements of import, export, and general trade controls; and regulations designed to combat the funding of terrorism.

3. Human Rights and Working Conditions

Any business partner with employees of its own must ensure that suitable measures are in place to guarantee a safe, healthy working environment that guards against accidents and illness in line with the corresponding international standards.

In particular, any form of harassment, physical abuse, human trafficking, slavery, or forced or compulsory labor (including child labor) will not be tolerated. Haufe Group's business partners must also ensure that their subcontractors are not involved in forced or compulsory labor (including child labor). Furthermore, they are to treat their employees with dignity and respect.

Business partners must ensure that neither their employees nor any other workers associated with their operations are subjected to discrimination of any kind, due in particular to their ethnicity, age, ideology, religion, disabilities, gender, or sexual orientation. Employees must not be sexually harassed or abused, nor subjected to physical punishment or any other form of inhumane treatment. They must also not be verbally abused or physically or psychologically coerced into any actions. The threat of such treatment is also prohibited.

In addition, business partners of Haufe Group must ensure that their employees receive at least the minimum wage applicable in their respective locations, along with any additional benefits to which they are entitled by law. Business partners must also compensate their employees for any overtime worked in accordance with the

increased rates required by the laws of their respective locations. In countries that do not have such regulations, employees are to be compensated for overtime work based on their respective hourly wages. Furthermore, Haufe Group's business partners hereby pledge to follow each location's legal regulations on work time.

They must also guarantee their employees fair working conditions that comply with all the relevant laws regarding training and the right of association and assembly. Business partners must offer their employees the opportunity to bargain collectively, as well.

4. Conflicts of Interest

In maintaining long-term business relationships, both sides benefit from efforts to avoid conflicts of interest. Business Partners of Haufe Group must therefore ensure that their employees act in good conscience at all times. Employees' private interests and personal considerations must not have any impact on business-related decisions. Furthermore, Haufe Group's business partners must also avoid any situations or activities that could result in a conflict between the private interests of their employees or those of Haufe Group and the business interests of Haufe Group itself. Should a business partner become aware of a conflict of interest involving Haufe Group, that partner must report it immediately and inform Haufe Group's compliance department accordingly.



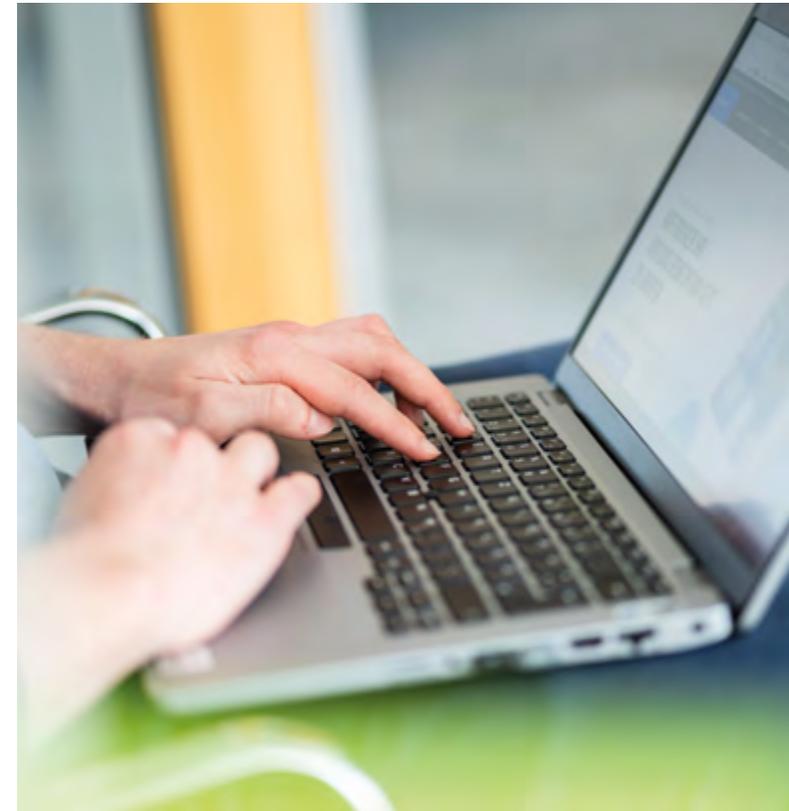
5. Data Privacy

The importance of ensuring data privacy is a fundamental principle at Haufe Group. The trust placed in the integrity of our data-processing systems and our ability to effectively protect all the data placed in our hands is one of the pillars of our ongoing business relationships.

Based on its respect for the privacy of all people, especially with regard to their personal data, Haufe Group strictly adheres to all regulations pertaining to the protection of such data. Violations of data privacy can result in significant financial losses and reputational damage. Only by maintaining a strong common culture of data protection with its business partners will Haufe Group be able to accomplish the aims set forth in the preamble to this Code of Conduct.

Any business partner that deals with confidential and/or personal data pertaining to the Haufe Group or its employees must treat it as strictly confidential and protect it against abuse, loss, and misappropriation. Such partners must take the technical and organizational measures necessary to ensure this protection at all times. Should a business partner gain access to data it was clearly not intended to receive, it must inform Haufe Group immediately. The same applies to possible violations of data privacy regulations. For further details on this subject, please refer to the respective agreements on data privacy and confidentiality. In situations where data is to be processed on behalf of another party or Haufe Group is

to bear joint responsibility for processing data along with a business partner, corresponding contracts must always be concluded in advance.



6. Environmental Protection

Haufe Group is conscious of the effect its business activities can have on the environment. It therefore strives to mitigate negative impacts to the best of its ability and follows all corresponding laws, regulations, and standards. Haufe Group expects its business partners to do the same and take any and all measures necessary to make judicious and energy-efficient use of resources, reduce waste and emissions, and continuously improve their efforts to preserve the climate and environment. In addition, they are to not only encourage, but require their employees to consume resources in a mindful, sustainable, and environmentally conscious manner.



7. Duties Regarding Records and Archiving

Business partners of Haufe Group must keep complete and accurate records of all their business transactions in accordance with the relevant laws. This means that every business activity must be documented in a manner that provides a clear and complete picture of the respective accounting purpose, along with the ability to associate it with the person who initiated the transaction (and thus bears responsibility for it).

The amount of time for which such records must be stored depends on the type of record-keeping obligation in question.



8. Fulfillment & Possible Consequences

In addition to fulfilling the requirements of this Code of Conduct, business partners of Haufe Group have a duty to report any violations they discover to Haufe Group. They must also ensure that their employees have the ability to report any violations of laws or this Code of Conduct to a manager or Haufe Group itself in an anonymous fashion without having to fear any work-related consequences.

To ensure compliance with the regulations specified in this document, Haufe Group hereby reserves the right to have an on-site audit performed or to inspect a business partner's corresponding documentation (with suitable advance notification). Should a business partner violate the regulations and principles of this Code of Conduct, this may have ramifications for the primary contractual relationship between said partner and Haufe Group. In such cases, Haufe Group hereby reserves the right to end its business relationship with the partner in question (including without notice) and assert any claims for damages to which it believes it is entitled. The group's business partners must also aid the investigation of possible violations and undertake whatever measures are necessary to prevent further breaches in the future.

In addition, business partners are to immediately report any violations committed by Haufe Group employees.

Such reports can be sent directly to Haufe Group's compliance department or submitted through its anonymous whistleblowing system at any time

- **Compliance department:**

E-Mail: complianceofficer@haufegroup.com
Tel.: +49 (0)761 / 898 3944 or +49 (0)761 / 898 1201

- Haufe Group's whistleblowing system provides all of its business partners and employees (as well as third parties) with a protected communication channel for submitting inquiries or information related to compliance issues. To access it, please use this [Link](#)