



Code of conduct

2023

SSC-Services GmbH
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Germany



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1 Code of Conduct

What makes a company successful? A good product or a good IT service alone does not determine success or failure. A bad reputation or lack of reputation of a company endangers its success. Business success requires legally compliant behaviour by directors, managers and all (freelance) employees. This creates trust, credibility, reliability and reputation. Integrity and personal responsibility of every individual for their actions also play a major role.

Business success is not above law and order, nor morality and integrity. How SSC achieves business success is as important as the business success itself. The Code of Conduct is the guiding framework for this. It combines two important aspects: on the one hand, the requirement to comply with the law and, on the other hand, the special requirements for behaviour with integrity. At SSC, the Code of Conduct applies to managing directors, managers and all (freelance) employees. It provides an overview of SSC's understanding of values and the behavioural requirements for employees and is concretised by internal guidelines and regulations as required.

This understanding of values includes mutual respect as well as recognition and appreciation in our daily dealings with each other. In implementing the Code of Conduct, everyone at SSC acts both in accordance with the respective national laws and regulations and based on the laws and regulations of the respective country. However, the code of conduct as a guide alone is not sufficient. It must be accompanied and supported by role models. This role model function is first and foremost the responsibility of SSC's managers, who set a credible example of legally impeccable conduct with integrity and at the same time ensure that employees are aware of and understand the Code of Conduct and the behavioural requirements it describes.

1.1 Corporate governance

SSC-Services GmbH complies with all legal and statutory regulations for the management and supervision of companies as well as the internationally recognized standards of good and responsible corporate governance.

1.2 Business relations

Trust and fairness in business decisions determine how SSC deals with its business partners. Private interests and personal benefits of employees do not influence business decisions.

1.3 Corruption

In order to maintain the trust of customers, business partners and the public, SSC firmly rejects any form of corrupt behaviour and avoids even the mere appearance of it. This unequivocally means that SSC employees may not offer, promise or grant advantages to members of the public sector or to decision-makers in private-sector companies at home or abroad in order to achieve beneficial behaviour or decisions in favour of SSC. SSC employees must also be mindful of this when offering gifts and invitations to business meals and events.

SSC employees do not allow themselves to be promised or offered benefits and they do not accept benefits if this can or will create the impression in the mind of the provider of the benefit that as a result employees can be influenced in business decisions. Furthermore, SSC employees never demand a personal advantage for themselves or a third party.

SSC is aware that there may also be private contacts between employees and business partners. In this case, there is no objection to purely private benefits. In such cases, employees of SSC-Services GmbH must be careful to ensure that privately granted benefits do not give the appearance that business decisions could be influenced. In case of doubt, the SSC employee should describe the situation to the organization and ensure transparency.

1.4 Freedom of association

SSC recognizes and respects the legal right of employees to freedom of association and assembly, including freedom of association and collective bargaining.

1.5 Human trafficking, human rights

Any form of human trafficking and non-respect of human rights is strictly prohibited at SSC and is strongly condemned.

1.6 Non-discrimination

In all employment decisions, including hiring and promotions, remuneration, fringe benefits, training, dismissals and terminations, all employees are treated strictly according to their skills and qualifications.

The personal rights of every individual are respected. Unobjective preferential treatment or discrimination, as well as support or toleration thereof, is not permitted under any circumstances, neither in the relationship between employees nor in the relationship between employees and clients, nor in other constellations arising from the work for SSC. In detail, any preferential treatment or discrimination on the basis of ethnicity, religion or ideology, gender, sexual orientation, age or disability must be avoided. Furthermore, SSC does not tolerate violence, intimidation, bullying or sexual harassment.

1.7 Child labor

SSC adheres to the prohibition of child labor. Unless local laws set a higher age limit, SSC does not employ persons who are of school age or younger than 15 years. Employees under the age of 18 may not be employed for hazardous work.

1.8 Forced labor

Any form of forced labor, including prison labor and bonded labor, is prohibited.

1.9 Suppliers

SSC maintains trusting and fair business relationships with suppliers. Conversely, SSC expects suppliers to treat SSC with the same respect and integrity that SSC shows them. We expect the availability, confidentiality and integrity of information assets to be as high as our own infrastructure.

Suppliers are often also customers. SSC does not take unfair advantage of this and always separates the procurement and sales sides.

1.10 Competition

SSC and its employees are committed to fair competition in all business relationships. We ensure that no agreements restricting competition are made with competitors, customers and suppliers regarding prices, the market or the division of territories. This especially applies in the context of tenders.

Business decisions are made independently and without exchanging sensitive information with competitors. SSC does not disseminate false information about competitors' products and services. Likewise, SSC will not seek competitive advantage in any other unfair or abusive manner.

1.11 Donations

As a responsible member of society, SSC assumes social responsibility in the countries in which we operate. Based on the respective legal system and internal guidelines and regulations, as well as its own economic possibilities, SSC is a multifaceted promoter of education, culture and social causes.

These grants are made through collaborations, donations of money and goods, and services. SSC does not make donations to obtain business benefits. Donations to individuals, to private accounts and to persons or organizations that may harm the interests or reputation of SSC are not granted.

1.12 Political contributions

SSC does not donate money to political parties and elected representatives, nor does it grant them monetary benefits that go beyond what is legally and statutorily permissible.

1.13 Money laundering

SSC takes all necessary measures to prevent money laundering within our sphere of influence.

1.14 Avoidance of other conflicts of interest

SSC expects that the personal interests of the management, executives and employees do not conflict with the interests of SSC. If a conflict of interest exists, it must be reported to the organization. The organization shall examine the situation and decide whether to transfer the relevant task to another employee.

1.15 Secondary activities

Secondary activities must not conflict with the interests of SSC. This applies for example and especially to secondary activities of competitors.

1.16 Private use of company property

The private use of company property is only permitted if individual law, collective law or company regulations or the company practice provide for this.

1.17 Health and safety at work

Health and safety is a great personal good, which is also important for the success of our company. SSC attaches great importance to following health and safety guidelines. This includes the prohibition of illegal drugs and alcohol during working hours.

1.18 Dealing with modern information technology and media

Social media opens new ways to interact with existing customers as well as potential new customers or job applicants, business partners and the outside world in general. When using social media, employees are aware of their responsibility for the company's reputation, always obey the law and adhere to the terms of use. Responsible and respectful online behaviour is assumed, and no confidential or sensitive company information is disseminated. Further reference is made to the provision on the duty of confidentiality.

When mentioning SSC in private social media posts, employees are aware that the facts and opinions mentioned may be associated with SSC by readers and may have adverse effects for SSC. They therefore always consider whether mentioning SSC in the post is beneficial to the company.

Official corporate communication with the general media (social media, SSC website, newspaper, radio, television, etc.) is primarily the responsibility of the management and the public relations team.

1.19 Dealing with information

Information security

The security of data and information is of highest importance to SSC. Information security influences business success and public reputation. In accordance with ISO/IEC 27001¹, SSC protects its own- and third-party data and information against unauthorized access, unauthorized and improper use, loss and premature destruction using all available suitable and appropriate technical and organizational means. This is done in compliance with the respective legal framework and national laws as well as internal guidelines and regulations.

¹ www.iso.org/standard/54534.html

To systematically meet the requirements and specifications, SSC has created implemented an information security management system (ISMS) in accordance with ISO/IEC 27001. As part of the ISMS, employees and managers are made aware of information security and related topics by providing them with comprehensive information and training as part of an internal training program that has been conducted online for a long time. Our established processes and methods guarantee compliance with internal requirements as well as consideration of the contractual requirements of our customers and partners. The measures are continuously updated, optimized and monitored and further developed by the appointed information and quality management officers.

SSC has had the effectiveness of the ISMS confirmed by external certification since 2015.

Data protection

SSC is aware of the high sensitivity of the personal data entrusted to it by our customers, business partners and employees. We protect this data by handling it carefully and responsibly. SSC takes a variety of technical and organizational measures aimed at ensuring the confidentiality of personal data. Every individual is responsible within the scope of his or her duties to ensure a high level of protection at SSC. SSC employees consistently comply with data protection regulations and in particular respect and observe the comprehensive rights of the individuals whose data we collect, process and use.

Zertifikat

Prüfungsnorm **ISO/IEC 27001:2013**

Zertifikat-Registrier-Nr. **01 153 1800362**

Unternehmen:



SSC - Services GmbH
Herrenberger Str. 56
71034 Böblingen
Deutschland

Geltungsbereich:

Projektmanagement, Softwareentwicklung, Betrieb von SaaS-Lösungen, Tätigkeiten als Prüfdienstleister. Sowie die internen Prozesse: Interne IT, Finance & Controlling, Marketing & Vertrieb, Personal, Public Relations und Verwaltung.

Erklärung zur Anwendbarkeit: V.1.6.0 vom 19.07.2021

Durch ein Audit wurde der Nachweis erbracht, dass die Forderungen der ISO/IEC 27001:2013 erfüllt sind.

Gültigkeit:

Dieses Zertifikat ist gültig vom 08.12.2021 bis 07.12.2024.

15.11.2021



TÜV Rheinland Cert GmbH
Am Grauen Stein · 51105 Köln

General confidentiality

In addition to the technical and organizational measures for data protection, every employee of SSC is obliged to protect the company's interests. For this reason, information from and about SSC is only communicated to authorized recipients. This applies to internal and external recipients. SSC also ensures the confidentiality of information and protects business documents from being viewed by unauthorized persons.

2 Compliance with the behavioural requirements

SSC expects the management, executives and employees to conduct themselves in accordance with the Code of Conduct. Violations of behavioural requirements, legal provisions, internal guidelines and regulations can have serious consequences not only for the individual personally, but also for SSC-Services GmbH. Therefore, deliberately reproachable misconduct will not be tolerated. SSC sanctions such misconduct and violations consistently and without exception within the framework of the legal provisions regardless of the rank and position of the acting and affected person. This also includes criminal prosecution in the event of corresponding misconduct. In order to create an awareness to point out misconduct and violations, SSC creates a climate and culture that is free from fears of negative consequences when such indications are reported.