

**REAL
PEOPLE.
REAL
BUSINESS.**

EFS
CONSULTING



EFS Unternehmensberatung GesmbH

EFS Code of Conduct

Version 1.1

September 2023



INHALT

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3. Our Code of Conduct (CoC)

WHAT WE STAND FOR

We stand for open, fair and sustainable cooperation in mind and action.



**REAL
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EFS Consulting is a business consultancy headquartered in Vienna, serving customers on four continents. We advise customers based on our know-how in our fields of competence along the entire value creation chain, from defining strategies to implementing them.

Our work and mindset are based on our EFS DNA, which describes our daily work and the way in which we at EFS interact with each other, our customers, partners and service providers.

In our EFS DNA, we have defined and put into words our idea of an open, fair and sustainable cooperation and mindset so that we can share this idea with others.

Why do we now also need a Code of Conduct? The answer is simple and sad at the same time: not everyone around the world is taking topics like child labour, fair remuneration, diversity, sustainability, etc. as seriously as EFS does.

That is why we felt that we should define a Code of Conduct which clearly sets out our values.

We expect ourselves, the whole EFS team, our partners and service providers to adhere to this Code of Conduct as a guiding principle for actions and ideas every day.

Our Code of Conduct complies with national and international requirements and conventions, including the principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the relevant conventions of the International Labour Organization (ILO).

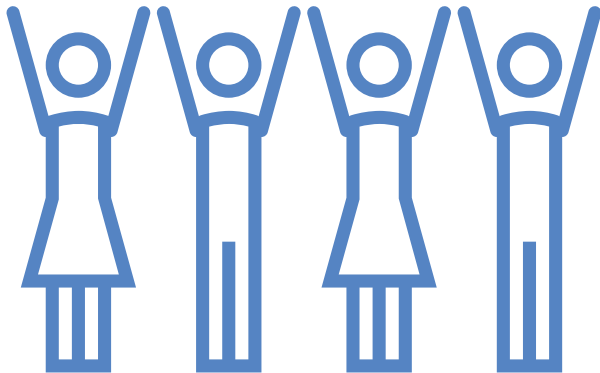
Christian Schaupp
CEO

TO WHOM DOES OUR CoC APPLY?

Our Code of Conduct (CoC) applies to everyone working at and with EFS.

Our CoC addresses everyone who works with us: all EFS employees, our partners, our customers, our service providers and our suppliers.

EFS and everyone working with EFS commit to the principles lined out in the CoC. It defines a binding framework for our business activities that allows everyone to be aware of their personal responsibilities.



Internal:

The CoC applies to all employees regardless of their role and position. We expect the entire EFS team and joint ventures led by EFS to

- agree with the CoC principles,
- use the CoC as a basis for their actions and ideas,
- act as multipliers for internal and external stakeholders.

External:

We want to cooperate with business partners who share our concern for compliance, safety, security and ethics. We expect third parties and cooperations led by EFS to

- agree with the CoC principles,
- use the CoC as a basis for their actions and ideas,
- act in compliance with our CoC.

OUR CODE OF CONDUCT (COC)

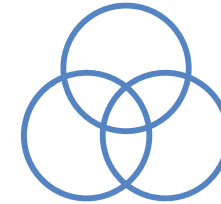
Overview



Respecting human rights



Free and fair



Diverse and inclusive



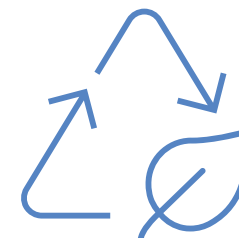
Healthy and safe



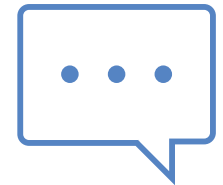
Business ethics



Information security and data protection



Environmental protection and sustainability



Addressing grievances

RESPECTING HUMAN RIGHTS

We are expressly committed to respecting human rights. Human dignity is inviolable.



We see all human beings as individuals who have their dignity and clearly defined rights. We pledge never to be involved in any human rights violations. For us, human rights constitute a red line that must never be crossed under any circumstances.

We also expect our business partners to treat all people in a fair manner and with respect, upholding human rights within their sphere of activity. We also expect them to fight human rights violations such as child labour, human trafficking and forced labour.



Prohibition of child labour:

We profess to comply with the Minimum Age Convention of the International Labour Organization (ILO). We will not tolerate any form of child labour.

Free choice of employment:

Any form of modern slavery, forced or compulsory labour is illegal and will not be tolerated.

Rights of minorities and indigenous peoples

We respect the rights of local population groups, minorities, indigenous peoples and other vulnerable groups. We are committed to preventing any negative effects on them.

Land, forest and water rights and forced evictions

Illegal forced evictions and the illegal confiscation of land, forests and bodies of water must be avoided.

Employment of private and public security forces

We will not tolerate the employment of private or public security forces to protect business projects if these security forces disregard the prohibition of torture, cruel, inhuman and degrading treatment, if they harm health and life or if they infringe the freedom of association.

FREE AND FAIR

We stand for cooperation based on mutual respect and appreciation.



We think that our company's growth is based on the personal development of our employees. Openness, mutual respect and fairness create the right climate to foster such development.

We do not tolerate any form of intolerant, discriminatory or abusive behaviour.

Fair remuneration:

Ensuring equal opportunities and fair remuneration for everyone at EFS is a matter of course for us. Our remuneration and social benefits comply with the respectively applicable national requirements or correspond to the standards in similar fields of business.

Working hours:

Maximum working hours conform to the respective national provisions as do compensations for working overtime, rules for taking leave and health and safety at work.

Networking and exchange:

We promote and support initiatives of our employees, their direct exchange and networking among them.

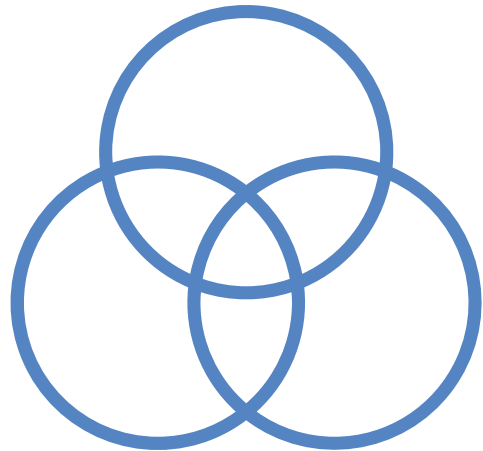
We want our employees to talk about important topics, including working conditions, further education etc., directly to their superiors and the management team without any fear of repercussions and to openly address their concerns.

Leadership:

We want to provide our employees with the space they need to grow and tap their full potential. Our company culture is focused on finding solutions and creating an environment in which everyone can thrive and develop, using their personal strengths, interests and competencies in the best possible way.

DIVERSE AND INCLUSIVE

We promote and respect diversity and all related needs and potentials.



We appreciate each person as an individual and respect them the way they are. Working in diverse teams is important to us as we see diversity as an asset and an opportunity to gain new perspectives, better understand our customers and achieve a more comprehensive view of topics and situations, which will then allow us to give the best possible response.

For us, diversity is not just a buzzword. We respect each person as an individual and try to make sure to be mindful of all our employees' specific needs. Respecting the principles of non-discrimination is barely enough for us. We want to create safe spaces for our employees.

We are fully aware of the importance of protecting our employees against discrimination, which is why we take systematic steps against any form of discrimination and discriminatory harassment.

Respect:

We treat all our employees, business partners and all other people with respect, irrespective of their gender, ethnic and social origins, nationality, colour, sexual orientation, religion, belief, age or disability.

Recruiting and ethics:

We recruit, deploy and promote employees based on their qualifications and skills.

Personal needs:

We are aware of people's different needs and take account of them by offering our employees specifically tailored opportunities for further training, flexible working hours, job rotation, support programmes, solutions for religious holidays, etc. Women's rights are particularly important to us. We attach special importance to offering all genders equal opportunities and equal treatment.

What we disapprove of:

We disapprove of any behaviour that gives rise to an abusive, hostile, derogatory or threatening working environment. This includes any form of discrimination and harassment, such as sexual harassment, psychological and physical violence.

What we expect:

We expect everyone to consistently comply with anti-discrimination provisions.

HEALTHY AND SAFE

Our employees' physical and mental wellbeing is our topmost priority.



It is very important to us that all our employees feel comfortable when working at EFS. We believe that allowing employees to work on interesting projects and address interesting topics, an open organisation and a friendly working environment are essential for them to feel comfortable at work. We strive to guarantee a healthy and safe working environment for everyone. We regularly verify our compliance with the Austrian Health and Safety at Work Act.

Occupational health care:

Our company doctor is responsible for our employees' health at work. She offers consulting on all topics related to the protection and promotion of health and preventive health care (such as eye tests and vaccination advice). All employees may consult our company doctor.

Accident and incident management

Our accident and incident management is based on emergency preparedness and prevention measures. In case accidents at work or other incidents happen in spite of these measures, they have to be immediately reported. Based on an accident analysis, we will then define and implement measures to prevent similar accidents or incidents in the future.

Safety and fire protection:

Internal officers keep all our employees informed about questions of occupational safety, first aid and fire protection as part of our emergency preparedness measures. In a safety training, they instruct them about adequate response measures.

Workplace evaluation:

We regularly evaluate workplaces to identify and assess potential hazards at work and the measures to prevent them. These evaluations include aspects that might give rise to work-related physical and psychological stress.

Paid leave:

Paid leave and periods of rest and relaxation are important for people's health and wellbeing. It is thus very important to us to ensure that all employees are able to take their annually due period of paid leave within the respective calendar year.

BUSINESS ETHICS

Integrity is at the basis of everything we do.



Our good reputation is crucial to us. EFS and all our employees comply with applicable national and international laws. In addition, everyone at EFS is obliged to observe internal rules and regulations. We consider financial responsibility, diligent records and transparency in keeping with legal requirements a matter of course.

Corruption, bribery and extortion:

We firmly oppose corruption, bribery and extortion of any kind. We observe all applicable rules and treat all our partners fairly. We expect the same from our customers, suppliers, partners and any company/person we cooperate with.

Accepting gifts:

We consider it inappropriate to make or accept gifts as part of business dealings. We only make and accept gifts if they are of moderate value, are clearly a gesture of courtesy and do not violate the compliance rules of either giver or giftee. We strictly oppose gifts that are made with the aim of exerting inappropriate influence.

Money laundering:

We engage in business activities only with respectable customers, suppliers, partners and companies/individuals who comply with applicable laws and statutory provisions.

Conflicts of interest:

An individual's personal interests must not affect their professional judgement. While on duty, our employees act exclusively in the interest of EFS.

Plagiarism and intellectual property:

We fully respect intellectual property and do everything to protect it. The use of any kind of plagiarised work is expressly prohibited.

Export control and economic sanctions:

We respect export control measures and economic sanctions imposed by governments and international organisations.

INFORMATION SECURITY AND DATA PROTECTION

We are aware of our responsibility and are continuously working on improving information security and data protection.



Every day, our customers entrust us with confidential information. We are aware of the resulting responsibility and thus take the necessary steps to appropriately protect confidential information and business documents from being accessed by third parties and team members who do not work with the respective customers.

Information security:

The security of project-related information is essential for both EFS and our customers. EFS has thus been certified according to ISO 27001 and TISAX. Based on this certification, we use a special information security management system (EFS ISMS) to ensure the following three essential criteria for any item of information:

- Confidentiality
- Integrity
- Availability

Data protection:

We consider the protection of personal data of our employees, customers and suppliers crucial.

We do not collect or process any personal data without the consent of the respective individual or a legal requirement to do so.

Awareness training:

Everyone must be aware of the importance of information security and data protection. Regular awareness training guarantees the entire EFS team this awareness and allows employees to compare notes in a hands-on manner.

ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

We always strive to protect resources.



We are aware that we have just this one planet and thus consider environmental protection an essential part of our company's sustainable development. To make our environmental protection efforts efficient we need commitment from all our employees, partners and service providers. EFS supports selected initiatives and continuously strives to optimise the company's efforts.

Waste management:

Avoiding all sorts of waste whenever possible is our topmost priority. Waste that cannot be avoided will be separated and recycled, if possible.

Energy efficiency:

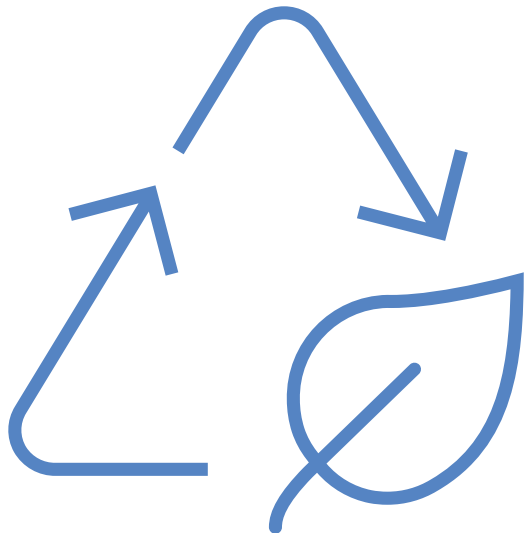
We use state-of-the art technology to reduce our energy consumption and related greenhouse gas emissions. Renewable resources also allow us to further reduce the negative impact of our energy demand.

Circular economy:

We implement a sustainable resources management by extending the lifecycle of our office and technical equipment (desks, chairs, computers, monitors, mobile phones) and by donating equipment that we can no longer use to charitable organisations. Upon deleting any remaining data, we carefully prepare no longer needed equipment for its sustainable use in a second life.

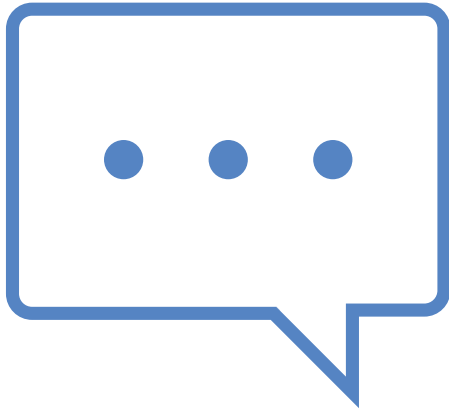
Travels:

Travelling to our customers is a central part of our business model. The sensible use of digital communication technologies helps us to continuously reduce our travels and the resulting carbon footprint. If travelling is unavoidable, we try to combine multiple travels, use carpooling and go by train rather than by plane.



ADDRESSING GRIEVANCES

We consider it our responsibility to ensure compliance with our Code of Conduct.



All employees are equally required to observe our CoC rules. Executives will in particular make sure that the CoC rules are complied with.

We ask all our employees, suppliers, service providers, partners and customers to address any unsafe/unethical/dubious behaviour and grievances observed and report any suspicions of potential violations of laws and provisions in their working environment.

Addressing grievances:

We create an atmosphere of trust where people are encouraged to voice constructive criticism in an appropriate way.

In our company, grievances or complaints can be reported to executives or specifically appointed officers.

Complaints procedure – whistle@efs.at

It is our concern to identify grievances as early as possible and react to them efficiently. To this end, we have established a complaints system that can be used by our employees, suppliers, service providers, partners and customers.

The complaints system protects the identity of those lodging complaints and provides efficient protection against retaliation and discrimination.

The contact persons acting as intermediaries between complainants and the company are impartial, independent and not bound by instructions.

The complaints procedure focuses in particular on violations against the Whistleblower Protection Directive, discrimination incidents and general infringements of CoC rules. However, this system may also be used to report any other grievances.



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