



# **P3 group GmbH**

## **Code of Ethics**

This code of ethics is property of the company P3 group GmbH.



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## Principles

The following code of ethics is binding for all employees and managers of all P3 companies. Non-compliance can result in disciplinary measures up to and including termination of employment. If you observe a violation by anyone within P3, please bring it to the attention of your 1:1 or site manager.

We, shareholders, managers, partners and employees of P3 and its affiliates, hereby commit and agree to the highest ethical and professional conduct:

1. to take responsibility for taking decisions that are consistent with the safety, health and welfare of the public and to disclose without delay the factors which might endanger the public or the environment
2. to avoid, as far as possible, real or perceived conflicts of interest and disclose them to the parties concerned, if they exist
3. to be honest and realistic in making claims or estimates based on available data
4. to reject bribery in all its forms
5. to improve the understanding of the technology, its appropriate application, and its possible consequences
6. to maintain and improve our technical competence and to take on technological tasks for others only if we are qualified to do so by training, experience or after full disclosure of relevant limitations
7. to seek, accept and offer honest criticism of technical work, to acknowledge and correct mistakes, and to give appropriate recognition to the work of others
8. to treat all persons fairly, without regard to factors such as ethnic origin, religion, gender, disability, age or national origin
9. to avoid harming others, their property, reputation, or employment by false or malicious acts

10. to support colleagues and employees in their professional development and encourage them to follow this code of ethics.

## Introduction

### 3.1. Overview

In accordance with the Company's commitment to the highest ethical standards and the P3 Code of Ethics, management has approved and implemented the following policies and guidelines:

*Ethics and Law:* P3 employees must conduct themselves in accordance with the company's commitment to the highest standards of ethical behavior and ensure full compliance with the P3 Code of Ethics and all applicable national and international legal obligations.

*Conflicts of Interest:* P3 employees shall avoid all activities that may give rise to a conflict of interest, including but not limited to; accepting or giving personal gifts or taking over the cost of entertainment other than gifts of nominal value.

*Bribes:* P3 employees may not, under any circumstances, directly or indirectly, offer, approve or pay a bribe to customers, suppliers, government officials or candidates or any other party in order to obtain or maintain business, except for gifts of small value (less than €100).

*Financial responsibility and obligation to properly document business transactions:* P3's responsible employees ensure that the company prepares and maintains books, records and accounts that reflect in reasonable detail, accurately and truthfully the transactions and allocation of the company's assets.

*Reporting of infringements:* P3 employees are obligated to report any suspected or actual violation of the P3 compliance principles or anti-corruption laws to the P3 management personally or anonymously via the internal tool "Kummerkasten". This includes, but is not limited to, actions that lead to conflicts of interest, prohibited or suspicious payments or payment offers to customers, suppliers, government officials or political parties. P3 will ensure that there are no adverse work-related consequences for P3 employees that would alert management to possible violations of these principles.

*Management support:* P3 chief compliance officer is available to P3 stakeholders for questions regarding the application or meaning of provisions of the P3 Anti-Corruption guidelines or other anti-corruption related matters.

### **3.2. Objective**

This manual is intended to ensure that P3 employees understand their responsibilities in connection with the P3 code of ethics. It is a tool to help our employees, partners, and representatives to prevent and detect bribery, corruption, or other improper behavior.

P3 is aware that its own long-term interests and those of its various stakeholders depend on compliance with applicable law. This manual has been approved by the P3 board and the P3 compliance officer and is presented and explained to P3 employees through briefing, training, and internal communication.

P3 has committed itself to adhere to its code of ethics wherever P3 does business. As a result, P3 employees are required to confirm that they have read and understood this manual, and that they follow it in their daily work.

Any conduct that is inconsistent with the compliance program documented in this manual or any laws must be promptly corrected and reported. Such incident is subject to disciplinary action up to termination of employment.

All P3 employees who have questions or concerns about this manual, anti-corruption laws, or activities by you or others must contact the [P3 Compliance Team](#).

Possible violations of the code of ethics or the anti-corruption compliance program can also be reported anonymously via the web-based [Kummerkasten](#) tool available on the P3 Intranet.

### **3.3. Applicability of the guidelines**

The principles set out in this policy apply to all persons working for or acting on behalf of P3. This includes all P3 employees, regardless of their seniority.

P3 does business in countries around the world, and its activities are subject to several laws.

Regardless of the country or countries in which P3 employees do business, they must always adhere to the code of ethics and P3 values and strictly observe the obligations set forth in this manual.

## **Corruption and bribery**

### **4.1. Anti-corruption guidelines**

P3 employees are bound by the P3 code of ethics and the laws of the country or countries where they do business activities.

Regardless of the country or countries in which they do business, P3 employees are under no circumstances allowed to pay or receive bribes.

Accordingly, all P3 employees and representatives must abide by the following prohibitions under all circumstances:

- At P3 we will not offer, approve, or pay bribes or any other valuable item to anyone, especially not to anybody:
  - Customers or customer representatives
  - Government officials, political candidates, or political parties to obtain or retain business or secure a business advantage.
- At P3 we shall not offer, approve, or make any payments or other valuable objects to third parties if we know or suspect the third party as:
  - a customer or customer representative
  - government official, politicians, candidates, or political partyto obtain or retain business or to obtain a business advantage. In case of doubt, please contact the P3 compliance officer.

### **4.2. Items of value**

The definition of a "valuable item" is broad and includes anything that could be sold to the public. This definition includes, but is not limited to, the following:

- Money
- Shares
- Illegal entertainment expenses
- Gifts with a value exceeding 100€

- Job offers
- Promises to pay money or provide something of value
- Payment of debts or other payments to a third party on behalf of a beneficiary
- Free of charge services.

This list is only a reference. Local customs may influence the definition of valuable assets. If you are uncertain whether a gift is appropriate under the company's anti-corruption compliance policy or anti-corruption laws, contact the compliance officer for assistance.

Policies regarding gifts of low value (less than 100 euros) and legitimate business expenses are covered in the next section.

### **4.3. Permitted gifts and benefits**

Although payments to other parties, especially to customers and government officials, are prohibited in all circumstances if they are intended to obtain or retain business or to secure a business advantage, certain gifts of low value may be made and certain entertainment expenses paid, as long as they are lawful and meet the standards listed below.

If you have questions about whether a gift or expense is acceptable, contact your\*<sup>n</sup> 1:1 or the P3 Compliance Officer for further assistance.

#### **4.3.1 Gift guidelines**

A gift is defined here as a material gift. In general, gifts can be given or accepted without violating the P3 code of ethics or the anti-corruption policy if they meet the following criteria

- Giving or receiving a gift is permitted under local written laws
- Gifts of money are never allowed.
- The gift is customary and appropriate in the circumstances
- The gift is not extravagant or wasteful and its value is less than 100 €
- The gift is given or received without any indication that it is intended for an improper or prohibited purpose, such as obtaining or maintaining a business or securing a business advantage

- The giving and receiving of the gift is done in public, and no aspect of the exchange is concealed or misrepresented.
- Expenditure on the gift is recorded accurately and clearly in the company's books and records.
- It is not always easy to assess the appropriateness of the level of hospitality costs. If you are in doubt about whether entertainment and hospitality costs are appropriate or permissible under our guidelines, please contact your 1:1 or the P3 compliance officer.

#### **4.3.2 Hospitality and entertainment guidelines**

First and foremost, an amount must be reasonable to be considered a legitimate entertainment expense. In general, if the expense is legitimately tax deductible as a business expense, it is unlikely to violate anti-corruption laws and P3 guidelines.

The following guidelines will help you determine appropriate hospitality costs:

- Entertainment costs comply with all local laws
- An expense does not appear to be inappropriate or excessive
- Expenditure is in accordance with local customs and traditions
- Expenses are reasonable
- Hospitality is related to the business, with which it is associated
- Hospitality is open and transparent; no aspect is concealed or misrepresented
- Hospitality costs are recorded accurately and fairly in the company's books and records
- Travel expenses may not be reimbursed
- Accommodation costs may be compensated, provided they are not excessive

#### **4.4. Fair Competition and Anti-Trust**

We are committed to fair and ethical competition and comply with applicable laws and regulations designed to protect fair competition. We ensure that our business practices and decisions are fair and objective, and that we do not collude with other companies to manipulate prices or market share.



## **Suppliers, subcontractors, partners, consultants and other third parties**

P3's managers and employees can be held liable for the actions of their business partners - such as suppliers, representatives, consultants and contractors - if their actions violate anti-corruption laws.

Before entering a business relationship, it must be ensured that potential suppliers, partners, consultants and other third parties do not violate the applicable guidelines.

If one of the warning signals listed here is observed or if there is any other suspicion that a partner is engaged in corrupt or prohibited behavior, report this immediately to the P3 compliance team.

Warning signals: What should you pay attention to when screening a partner?

- Unusual, incomplete, inaccurate, unprofessional, or incorrect billing documents
- Unusual high fees, refunds, or advance payments
- Requests for payment in negotiable currency or bearer instruments or in a foreign currency unrelated to the place where the services are provided
- Making political contributions or charitable contributions to have influence on, institutions with ties to government officials, political parties, or candidates for political office or their relatives
- Involvement of a partner or his clients, investors, or senior executives in criminal proceedings
- Unusual expenses for gifts, travel, or entertainment, without prior written permission from P3
- Repeated payments in the same or similar amounts or payments in round amounts or other unusual amounts
- Invoices that are paid unusually quickly, or unusual high payments, individually or in total, to a single recipient
- Unexpected rewards for employees or other parties with bonuses or loans, without a credible explanation

## Financial recording obligation

The vouchers, financial records and external documents required for accounting purposes must be properly maintained, stored and retrievable at any time.

Internal audits are designed to ensure that all transactions are recorded accurately and fairly, so that our financial statements can be properly prepared and full accountability for all our assets and activities is assured. Accounting and financial reporting practices must be fair and orderly in accordance with relevant company standards.

We expect you as a P3 employee not to engage in misleading or fraudulent financial practices and to report such practices to the P3 Compliance Team if you become aware of them. You are required to immediately report significant deficiencies in internal financial controls that adversely affect the proper accounting, record keeping, and appropriate recording of P3's assets, liabilities, revenues, costs, and expenses.

Examples of financial practices that are always prohibited and must be reported to the P3 Compliance Team:

- Use of P3 assets, facilities, or services for an improper purpose.
- Making any entries in P3's books or records that intentionally hide or disguise the nature of any transaction or liability, or intentionally make or cause a misclassification of transactions in relation to accounts or accounting periods.
- Making a payment in connection with a suspicious transaction to an unknown counterparty for a purpose other than that described in the documents or other reasons to suspect that the transaction or payment may be related to bribery or corruption.
- Missing or incomplete documentation of transactions.
- Fraud in the preparation, evaluation, or audit of financial statements or in the recording and keeping of financial records at P3.
- Misrepresentation to governmental authorities or to P3's internal or external auditors or accountants regarding a matter contained in P3's financial records, financial reports or audit reports

## Data protection and information security

P3 commits itself to adhere to the currently valid guidelines and regulations of data protection when processing personal data, as well as to guarantee the compliance with the requirements of information security when processing customer, supplier, and employee data.

Appropriate measures must be taken to protect personal data from data protection violations and data loss. A data protection violation occurs when intentionally or unintentionally a P3 user, a third party, or an unauthorized person has been granted access to confidential data.

More detailed information security and privacy guidelines are included in the [Information Security Awareness Training](#). This training is mandatory for all employees.

## Intellectual property

### 8.1. Protection of intellectual property

P3 takes appropriate technical and organizational measures to protect the intellectual property of customers as well as employees.

P3 employees who have access to intellectual property or confidential information may only use it as far as it is necessary for the fulfilment of their professional tasks.

### 8.2. Plagiarisms

We take great care to comply with applicable legally binding property rights of third parties and take care not to use or copy confidential information of third parties unless we have permission or another right to do so.

## Questions and reporting procedures for infringements

If you have any questions regarding the anti-corruption compliance program, this policy or the anti-corruption laws, please contact the P3 compliance team.

Suspected violations of the current P3 guidelines can be reported anonymously using the "[Kummerkasten](#)" tool.

## **Counterfeit Parts**

We are committed to using only genuine parts and materials and to taking action against the sale and use of counterfeit parts. We ensure that our services meet the highest standards and that they are safe and reliable.

## **Export Controls and Economic Sanctions**

We comply with applicable export control and economic sanctions laws and regulations and ensure that our business practices comply with domestic and international regulations. We carefully review all exports and transactions to ensure they comply with applicable laws and regulations. We do not support activities that could lead to the violation of export control or economic sanctions laws.

## **Punishment of infringements**

P3 commits itself to ensure the compliance with the P3 code of ethics. This effectiveness depends on consistent enforcement.

Reported cases involving employees suspected of violating the anti-corruption compliance program, this manual or other policies will be fairly investigated.

Any conduct that is inconsistent with the P3 compliance guidelines must be corrected immediately and is subject to disciplinary action up to and including termination of employment.

P3 also fully cooperates with law enforcement agencies in the countries where it does business, to assist in the civil or criminal prosecution of violations of applicable laws.