

Code of Conduct



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1. Foreword

With this Code of Conduct we are establishing a binding foundation for behavior, which contains guidelines for ethical, social and legal aspects. From working student to manager, from employee to freelancer, from Munich to Singapore - this Code of Conduct is binding for every Retarus employee at every Retarus company around the world and at the same time bonds them together. In the following we use the term “employee”, “member of staff” and “we” to refer to all Retarus workers, no matter whether their work tasks are performed as permanent employees, as freelancers, as temporary workers, etc. The term “business partner”, on the other hand, encompasses all persons, with whom Retarus is engaged in a business relationship. This includes customers, partners and suppliers.

This Code of Conduct was developed from the bottom up, by members of staff from all parts of the company, with the aim of considering as many differing perspectives in order to create a common basis for conduct.

2. Integrity and Prevention of Bribery and Corruption

Integrity

For Retarus the responsible behavior and a high level of integrity of our employees in their daily dealings with each other and in business relationships are important components of our compliance with corporate guidelines. The actions of our employees are based on respect. We always comply with the applicable legal regulations and company-internal guidelines. Other basic principles underlying our dealings with others are transparency, equality, confidentiality and mutually-beneficial collaboration. We appreciate and value being perceived as a loyal and trustworthy company by our business partners. A high level of integrity with regard to conduct serves as the supreme maxim for all our businesses around the globe. This we also expect, in return, of our business partners. Cooperating with business partners who have little integrity or honesty in their dealings and conduct is not an option for us.

Preventing and combating corruption

Dealings and misconduct which are punishable by law, particularly corruption, are actively prevented and combated at Retarus. Conflicts of interest which may occur in this context are actively and transparently resolved. The prevention of corruption is a basic and global prerequisite for Retarus’ success in business.

Granting of undue advantage – Offering or providing advantages

The offering or granting of undue advantage - no matter which form this may take - is not tolerated at Retarus. In performing our tasks and duties we do not promise to provide nor grant to any other persons any unauthorized and undue services or objects of value in order to influence them to make a decision in favor of Retarus.

This prohibiting of undue advantage applies in equal measure to those in a position of authority, i.e. government officials, judges or other persons working in an official capacity, as well as Retarus’ business partners. Gifts and other gratuities or donations to officials are not permitted. It is allowed to give minor gifts (with a low value) and sundry gratuities to business partners, as long as they are appropriate and selected in such a way as to preclude any semblance of dishonesty or impropriety. In general, typical or common

marketing giveaways or occasional gifts are permitted, as well as gifts which are in accordance with local customs and courtesy in the respective country. The upper limit for the value of gifts for business partners can vary according to country and should be requested from the responsible supervisor. Invitations and corporate hospitality from business partners - regardless of the upper value limit - are considered minor gifts and gratuities as long as they are appropriate and within generally accepted limits for business. In cases of doubt it is necessary to consult the responsible supervisor. For corporate hospitality which exceeds a certain upper value limit (per invitation/per person) it is essential that approval be obtained from the supervisor. These upper value limits also may be subject to local differences and are communicated by the respective local supervisor. Under no circumstances may payments in cash or any other money payments be offered or granted.

Requesting and accepting undue advantage

No personal advantages may be requested from or accepted by our employees. Minor gifts (with a low value) and sundry gratuities may be accepted in general. Minor gifts (with a low value) are defined as gratuities and sundry advantages of which the value does not exceed a specific amount per gift/person - which varies according to location. Gifts which are not considered minor gifts (with a low value) must be declined. Should declining a gift be considered impolite in general business conduct in a specific country, then gifts exceeding the value of minor gifts must be donated to charity. Under no circumstances may payments in cash or any other money payments be accepted.

Invitations to entertainment events and restaurants may only be accepted if they serve to build up or improve business relationships, in no way inappropriately influence business decisions made by Retarus and are in keeping with business customs in that particular country. Other business partners may not be disadvantaged unduly as a result. This means that restaurant invitations and minor gifts from business partners may only be accepted if the occasion and extent of the hospitality is appropriate, the gifts are occasional and of minor value and declining the offer of hospitality would be considered impolite. This guideline especially applies to the awarding of contracts.

Donations

Retarus does not make donations to political parties or foundations and institutions with close ties to a political party.

3. Data Privacy and Confidentiality

Data privacy

We consider the data of our employees and business partners to be valuable property and protect it globally, while considering all locally applicable laws and regulations.

We consistently comply with all relevant data privacy regulations and commit ourselves to handling confidential information with great care.

Data reduction, data economy and transparency of data processing

The protection of the right to privacy of our employees and business partners is of the highest priority. Personal details which have been provided to us are only collected, processed or used to the extent that it is necessary, but also permitted by law or where consent has been provided by the persons concerned.

The safeguarding of confidential information, business documents, know-how and corporate secrets is essential for our collaboration with our business partners. This does not only apply to our own data, but also to the information that we have received from our business partners for the purpose of performing contractual services for them.

We commit ourselves to only using the data and information which has been gathered in the course of our operations, exclusively within the authorized scope and for the defined purpose. Prior to transferring data within and outside of the company, we commit ourselves to verifying whether the recipient is entitled to receive the data.

In this way, we pledge to uphold the basic principles of data reduction and data economy, as well as transparency in the data processing. With this aspiration we ensure a uniform and appropriate level of data privacy and protection throughout the corporation.

Through regular, mandatory training courses for data privacy and data security we are able to react quickly to new or amended requirements and regulations. As a result, we can ensure that all confidential data and information is handled in an appropriate manner.

Data privacy officer and reporting of violations

We have appointed a data privacy officer to advise the management in matters relating to data privacy and to support the departments with the implementation of data privacy measures.

Should an unauthorized person attempt to obtain confidential information from a Retarus employee, then the employee is required to inform the Data Privacy Officer and/or the IT Group Compliance/IT Security of the attempt without delay.

4. Business Relationships

Behavior and communication

Successful together. This motto lays the foundation for our thoughts and actions in dealing with our business partners. In this regard, our behavior is marked by professionalism, respect, fairness and reciprocity. As a communication company we value responsible, exemplary and professional communication with our business partners very highly - irrespective of differences in culture and language. No matter whether in person, in writing or by phone: We interact with each other in a friendly way and live out the positive image of the company by expressing ourselves in a respectable, precise and reliable way. We also expect all business partners to satisfy these expectations.

Quality standards and long-term orientation

We ensure the highest levels of customer satisfaction, through the efforts of Retarus employees on four continents to ensure efficient communication processes with immediate success checks day after day. We have this checked and documented by means of regular audits.

Within the scope of our high-quality services and smooth processes we set great store by long-term, sustainable business relationships. Moreover, we understand the needs of our customers and partners, also with regard to sector-specific requirements. We respond proactively to changes in markets and developments in the general constraints and conditions.

Transparency and openness form the basis of trust in regular discussions with our business partners. These discussions serve as a cause and motivator for the ongoing development and improvement of our services.

We lay great emphasis on assisting our customers in reaching decisions by providing them with top-notch consultancy. Our high quality standards are coupled with engaged and committed conduct, which is reflected in our communication with our customers.

5. Innovation and Inspiration

We're always on the move - innovation is our company-wide philosophy. Through creative conduct in all parts of the company we expect and promote innovation and inspiration. Innovation is not only limited to technology and our product portfolio at Retarus, but also manifests itself - for instance - in regularly reflecting on, reviewing and improving existing structures and processes.

We are an innovation leader that shapes markets. As a strategic partner, we develop forward-thinking technology and services that provide greater value and substantial benefits - together with and for our customers. We draw inspiration from the mutually beneficial exchange of knowledge with our customers and research institutions, such as universities.

We promote research by providing time and resources for development. By adopting new perspectives we create new approaches. We are inspired by bold and outstanding ideas. Retarus employees are regularly provided with the opportunity and freedom, in co-ordination with their supervisors, to develop and pursue their own creative ideas. Our flat hierarchy means that every member of staff can and should contribute their own ideas and suggestions. We are convinced that innovation arises from each and every mind. We all contribute to innovation.

6. Internal Cooperation

Teamwork

Our collaboration is characterized by respect and trust. We place great emphasis on hierarchies that are as flat as possible, and teams that are manageable in size. We deal with one another fairly, openly and honestly. We value our local and international colleagues and business partners.

As part of this value-oriented collaboration, each and every employee is encouraged to get involved in what goes on within the company. It is our responsibility to provide a working environment that fosters productivity and fun within the workplace.

Employees with a handicap are welcome at any time. It is important to us to devote particular consideration to individual needs and requirements.

We believe efficient teamwork is the key to success and are proud of our performance. In doing so, we look beyond the scope of our own work and consider the consequences of our actions on others. The company's overarching goals and objectives are our main focus. To this end, we work together beyond the scope of our own teams and departments, while also thinking interdepartmentally and internationally. In order to facilitate an interdepartmental understanding and respect for different perspectives, we have an internal Customer Experience project in place, for example, where every member of staff has the opportunity to meet our customers and attend appointments with customers. We do not accept partial optimizations that are a detriment to the company as a whole.

Communication

We place great emphasis on responsible, exemplary and professional communication; this also extends to internal collaboration and collaboration spanning different cultures and languages. We are aware of cultural differences when dealing with colleagues and business partners from other countries and backgrounds, which is why we mutually strive to meet the individual needs of our counterparts and show a great deal of understanding if they have little intercultural experience. If necessary, staff members are sensitised and trained on the topic through "intercultural training".

Communication takes place in respectful and honest language. We attach great importance to an open communication culture, value the free exchange of ideas, and involve employees when looking to come up with ideas, take decisions and solve problems. We communicate promptly, time, clearly, directly and in person. Our communication culture is relaxed and authentic, yet reliable and precise.

Methodical Way of Working

We approach our tasks and duties in a sufficiently methodical manner, think holistically about potential consequences, and are always in a position to offer information about the current status of our projects.

Meeting Culture

In meetings at Retarus, collaboration both between departments and within a department are bindingly organized and continually optimized as part of an ongoing process. In line with our meeting culture, meetings start and end on time, and are always oriented around an objective that has been clearly defined in advance. Here we attach importance to open and respectful collaboration, while observing the applicable meeting and communication rules.

Leadership

Our managers actively promote collaboration within their teams as well as with other areas of the business. On top of that, they continually develop their own team in line with the corporate strategy. They reinforce our identification with and loyalty to the company.

Our managers communicate unambiguously and provide their team with comprehensive information about all major topics in good time. They actively foster awareness for customer focus among their employees, and delegate tasks, competence and responsibilities in a clear and unequivocal manner. Furthermore, they support their employees in regards to the organization and management of their tasks and ensure a methodical way of working. They provide a fair and regular assessment of their employees, and support

their development on an individual basis. Sensible delegation is a managerial task that helps to ease the burden on the manager while expanding the scope of responsibilities of the employees themselves.

Conflict

We assume responsibility: Observations made during the course of our collaboration are actively discussed, providing impetus for future actions. We consider feedback to be a form of support and use it to improve ourselves. Our collaboration is defined by reliability, willingness to help, and by providing feedback without being prompted to do so.

We listen to one another and openly discuss conflicts that arise during our collaboration. We provide constructive criticism that is never personal and use conflicts as a stimulus for improvement.

We live a cooperative and respectful culture of discussion. We immediately discuss conflicts and handle them by using facts to find a suitable solution. Superiors or mediators can be called upon should the need to escalate a conflict arise.

7. Health

Understanding and importance of Health

At Retarus we place a great emphasis on employee health.

Every member of staff takes responsibility for caring for his or her own mental, physical and social wellbeing. Retarus has various measures in place to provide support in this regard.

The health of every employee is underpinned by the Retarus culture, which was jointly developed and is put into practice on a daily basis. A healthy work-life balance plays an important role in this. When assigning tasks and responsibilities to employees, care is taken to ensure that their workload and working hours are in line with personal resources and private obligations. Assigned tasks and duties are selected in such a way that employees are neither overexerted nor under-challenged. Managers are charged with ensuring that members of staff are given sufficient periods of rest and recovery, as these are essential for maintaining employee health in the long term.

Additional measures to promote health and safety

Safety in the workplace and accident prevention play important roles in every Retarus office space.

The offices are equipped with first-aid boxes and fire extinguishers, furthermore a defibrillator and blood pressure monitor can be found at the Front desk. Specifically trained first-aiders and a fire safety team can assist you in case of emergency.

In addition, we organize health days on a regular basis covering topics such as ergonomics and stress management. Interested members of staff are also able to take part in sports events organized by the company. Ergonomics and individual employee needs are taken into consideration when setting up workstations. We also set high value on aesthetics and design, which is why we have various works of art around our offices, for example, to ensure a pleasant office environment.

Retarus also has its own bistro that provides employees with a relaxed atmosphere where they can chat with one another, exchange ideas, and shift down a gear. The bistro always has a fresh fruit basket available. Interdepartmental exchange is also encouraged by Meet & Eat events along with various other company events regularly held in all our global offices.

8. Promotion and Development of Competencies

Competence

Competence, willingness to perform and responsible behavior by our employees constitute a significant prerequisite for our success. Promoting the creative and innovative competencies of our employees is therefore of strategic importance. Retarus uses its organization to support the development of its employees, not only professionally but also personally.

Vocational Training

We ensure high-quality vocational training and support our apprentices. For Retarus apprenticeships, and the planned employment following the apprenticeship, are basic building blocks in a sustainable staff policy which has a long tradition. For instance, Retarus was one of the first companies in Germany to offer a successful apprentice program for IT specialists.

Further education

The consistent training and further education of our employees secures our position as a market leader.

Retarus employees can agree with their line managers on measures for their further professional and soft skill development. In doing so, they benefit from a broad range of internal training and education options by the Retarus Academy. This includes, for instance, leadership trainings, sales trainings, certifications as well as language courses. Retarus also provides individual support for external training courses by agreement, especially by means of flexible working times and holiday planning, as well as financial support for studies in parallel to employment through Retarus' Education Support (Rafög).

With Retarus' expat and job rotation program we also offer our employees the opportunity, by agreement, to gain experience working in foreign countries and to develop intercultural competencies. Moreover, we counter the complexity of cooperation between our international subsidiaries with regular and mutual visits. This facilitates the necessary transfer of knowledge and culture.

Management

Managers at Retarus regularly receive targeted training and coaching; potential managers participate in our leadership development program. Managers at Retarus take responsibility for the continuous, individual advancement and development of their employees. In this regard, we value intensive and unambiguous communication.

Proactive conduct and individual initiative

As Retarus employees we take responsibility for ourselves:

Oriented to future requirements, we use our own initiative to develop our own competencies. Through self-reflection and a positive attitude towards criticism we continually improve ourselves. We know that we can learn from our mistakes. We readily share our knowledge and acknowledge the competencies of others. We learn not only for ourselves, but also for the benefit of the company and as a result also for our customers.

9. Diversity

Diversity comes from the differences between people, their traits, talents and experiences. These differences are based on factors such as place of origin, culture, religion, ethnicity, society, gender, age, physique, mindset and education. We know that every person is different. We commit ourselves to ensuring that individuals should not suffer any disadvantage as a result of their personal distinguishing features. We avoid and fight against discrimination and harassment due to race, skin color, ethnic background, religion, gender, nationality, age, sexual identity or any other distinguishing feature.

Diversity is important to us, in order to be able to better understand not only our business partners but also our employees and colleagues, and thereby consciously generate innovation for the benefit of our business partners and employees. We value heterogeneous teams and consciously foster the communication between members of staff with differing amounts of work experience.

Retarus supports the diversity of its employees through language courses, flexible working time models, health programs, training measures at the company, further education and training programs and individual measures, which are tailored to the requirements of a specific employee.

Retarus expects all employees to show respect and goodwill towards counterparts and contacts. We also see the workplace as a location for (personal) discourse and intercommunication. Differing opinions are accepted, tolerated and understood as a suggestion for improvement - as long as they are not of a radical or illegal nature. Dealing with varying points of view in a tolerant way prevents conflicts.

10. Sustainability and Social Responsibility

Sustainability

Our everyday conduct is characterized by sustainability. We view sustainability in a holistic manner. We see no contradiction between commercial success and socially or ecologically responsible behavior. Only a harmonious combination of economy, ecology and social responsibility lays the basis for sustainable success in business and facilitates a stable, secure and safe work environment. As an owner-managed company, our company strategy aims for healthy, long-term growth.

Social responsibility and engagement are important cornerstones of our corporate culture and key components of our company strategy. In this way projects are set up, which provide a lot of positive outcomes for people, the economy and the environment.

Sustainability of our portfolio

Retarus Messaging Services serve companies by optimizing their communication processes, reducing their costs and lowering transport costs for electronic data and documents over the long term. We consciously provide and develop approaches together with our business partners, which deliver maximum benefits to all parties over a very long period of time.

Living out sustainability and social responsibility

Since 2007, a green IT policy has consistently been implemented at Retarus' data centers by means of hydroelectric power and effective energy management.

Under the banner "Retarus hilft" (Retarus helps) our employees also provide ongoing support for regional social projects, such as "Lichtblick Seniorenhilfe" or "Frauenhilfe München", and so take on responsibility for others. Retarus, as a commercially successful enterprise, moreover supports local schools and facilities for the common good, as well as aid organizations. In this way, we combine continuous growth of the company with long-term social engagement.

Fostering and developing our employees has a special and central significance for us. Retarus creates workplaces for individuals around the world who contribute and develop themselves, while working with each other successfully in a responsible and respectful way. We highly value education and training, whilst actively supporting the development of young employees, and actively including staff in the development of the company.

11. Implementing this Code of Conduct

This Code of Conduct is designed to be a guide that every member of staff can consult in order to identify and deal with any ethical, social and legal issues that may arise in connection with working at Retarus. Such guidelines can only be fully effective if they are lived and experienced by every member of staff, and if they are incorporated as a fixed component of everyday working life.

Every Retarus employee is therefore obliged to comply with the guidelines set out here. This also means that employees should make an ongoing effort to learn about content relevant to their duties, guidelines that apply to them and any changes that are made to the guidelines. All of the managers see it as their duty to ensure that this Code of Conduct is complied with by their team or department.

Employees can address any questions they may have about this Code of Conduct to their supervisor or the HR department at any time. Any (potential) infringements or risks of infringement should be immediately reported to a manager, the HR department or Martin Hager. Anonymous reports can be submitted in writing to the "complaints box" in the bistro at the headquarters in Munich. In addition, a digital "Messaging Box" on the intranet is at our employees' disposal. By using this tool, employees can send an anonymous email to the HR department. To enable us to investigate the anonymous messages, it is particularly important to describe the facts in as much detail as possible. Any information submitted will always be dealt with in confidence, and employees who report a (potential) infringement in good faith have absolutely no reason to be concerned about being disadvantaged in any way. If necessary, employees can request a meeting with the HR department, which can be confidential if desired. The HR department is responsible for following up

on the information provided, evaluating it and initiating and implementing appropriate sanctions in the event of infringements.

We will not tolerate any infringements of this Code of Conduct and reserve the right to initiate labor law-related sanctions in case of any infringement. Depending on the type and severity of the infringement, sanctions under labor law may follow, such as work instructions, warnings and even termination of the employment relationship.

Overt commitment to and compliance with this Code of Conduct are paramount to our public image and help to build trust in Retarus and our services. Compliance with legal requirements and the guidelines set out here, moreover help us to ensure our high quality standards. Infringements of applicable law and this Code of Conduct, on the other hand, could have severe material and immaterial consequences for Retarus. As mentioned at the beginning, the Retarus Code of Conduct applies to every Retarus employee worldwide. Legal requirements and local customs may of course vary from country to country. National law always supersedes this Code of Conduct, but the guidelines set out in this Code of Conduct shall prevail over any differing local customs.

The Retarus Code of Conduct does not expressly repeat all of the other existing regulations, for example the Retarus Policies. The terms and guidelines provided therein shall continue to apply alongside this Code of Conduct.