

# anyMOTION CODE OF CONDUCT

## *Responsible people in a responsible company* [Rules & Policies]

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## Our commitment

Dear employees,

dear business partners

dear Sirs,

in this Code of Conduct, anyMOTION combines two of the most important topics of our time: digital transformation and corporate social responsibility ('CSR'). The self-image and success of anyMOTION pay off on both.

Our Code of Conduct forms the basis for trusting and successful cooperation between all people involved in the business activities of anyMOTION GmbH. The guidelines compiled here translate the relevant regulations through binding specifications for lawful and humane actions into lived practice and expand them to include our corporate principles. They serve to safeguard all interests and ensure that the dignity and personal rights of each and every individual are respected.

Our corporate culture and agile structures with scope for independent action distinguish anyMOTION as an employer and business partner. With the intention that every employee can help shape the future of the company while complying with legal requirements, success, satisfaction and job security can be maximized for all members of anyMOTION.

For us, the day-to-day observance of these guidelines is one of the principles of good corporate governance, which is why we commit ourselves and all our employees, as well as all our business partners, to their observance.

Should a violation of our Code of Conduct occur in the corporate environment, we reserve the right to terminate or dissolve the employment or business relationship. As a consequence of this attitude, every business partner of anyMOTION - whether as employees, customers, service providers or other third parties - can count on a reliable working environment with room for personal development. The foundation of anyMOTION's sustainable corporate success consists of humanity and creativity. This will continue to be ensured by and with our employees and a healthy network of partners with integrity.

Düsseldorf, 01/12/2022



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anyMOTION GmbH  
Sascha Sell, Managing Director



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anyMOTION GmbH  
Andreas Neumann, Managing Director

## 1. Human rights

We support the [United Nations Universal Declaration of Human Rights](#) and are committed to its observance in our everyday business activities. We reject without exception child labor, forced or compulsory labor and human trafficking, and oppose harassment and discrimination.

### 1.1. Child labor and young workers

The statutory age restrictions set out in the **Youth Employment Protection Act (Jugendarbeitsschutzgesetz)** apply. Accordingly, we employ children under the age of 15 and young people who are required to attend school full-time only within the permissible framework of student/company internships if these support the child's development.

When employing adolescents and young employees, we also pay particular attention to compliance with statutory regulations on working hours, rest breaks and hazardous work. In addition to the Youth Employment Protection Act, the **Vocational Training Act (Berufsbildungsgesetz)** also applies in particular here.

### 1.2. Forced or compulsory labor and trafficking in persons

All activities in our work environment are performed by our employees voluntarily and without coercion or threat of punishment.

We pursue the claim of transparency and voluntariness throughout the entire employee affiliation cycle. Even during the application phase, we explain the terms and conditions of employment as needed in a language the prospective employee can understand. We adhere to the law of evidence and put all employment relationships in writing before the contract is concluded.

### 1.3. Harassment

We reject any form of harassment. We respect and protect the dignity of our employees and treat them with respect.

Violent treatment or the threat thereof is prohibited in our company. This includes, but is not limited to: sexual assault, corporal punishment, psychological and/or physical coercion, or verbal abuse of another person. We promote non-violent and appreciative communication in our company.

### 1.4. Zero tolerance against discrimination

We offer equal opportunities for all employees and do not tolerate any form of discrimination as a matter of principle. We strictly comply with the provisions of the **General Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz/AGG)**, which prohibits discrimination on the grounds of race or ethnic origin, gender, religion or belief, disability, age or sexual identity. In addition, we are committed to taking equally active action against discrimination on any other grounds.

Rather, we see enormous potential for jointly developed, valuable solutions in the diversity of our employees with their different experiences, skills and personalities (see 2.6 Diversity, equality and inclusion).

## 2. Fair working conditions

The core labor standards of the International Labor Organization (ILO) form the basis of our social standards, which we strive to uphold in all our business activities.

### 2.1. Wages and social benefits

Compliance with the 'Law on the Regulation of a General Minimum Wage (MiLoG)' is a matter of course.

The amount of remuneration is independent of the employee's gender, but results solely from the qualification brought in, the quality of the work result and the economic efficiency of the action.

Salaries, social benefits and other entitlements arising from the employment relationship (e.g. paid sick days, special/holiday days, time off for further training) will be paid by us in due time in every aspect.

Overtime shall be compensated in accordance with the agreed regulations, and its occurrence shall at best be avoided.

### 2.2. Working time

We ensure that the applicable regulations of the **Working Hours Act (Arbeitszeitgesetz)** are observed. Overtime worked in excess of the contractually agreed working hours is performed by employees on a voluntary basis.

The regulations under the **Maternity Protection Act (Mutterschutzgesetz)** and the **Act on the Participation of Disabled Persons (Gesetz für Teilhabe von Behinderten)** apply, as does the **Federal Vacation Act (Bundesurlaubsgesetz)**.

We strive to enable our employees to combine family and career as smoothly as possible by accommodating individual needs as far as operations allow and by allowing flexibility in the time and place of service provision.

### 2.3. Freedom of association and assembly

We respect the right of our employees to freedom of association, collective bargaining and the formation of interest groups. Employees who are members of a trade union are not disadvantaged as a result. We grant our employees the right to defend their interests on the basis of national legislation.

### 2.4. Occupational safety and health

The well-being of our employees is our top priority. For this reason, we have established appropriate regulations for occupational safety, on which our workforce is regularly trained.

We comply with the applicable statutory rules and regulations on occupational safety and have defined appropriate responsibilities within our organization, for example through trained first aiders and fire protection assistants as well as participants in the **occupational safety committee**.

General protective devices such as fire alarms, emergency exits and guidance systems help us to prevent occupational accidents and dangerous situations.

We also ensure that all inspections required for optimum occupational safety are carried out on time and that testing requirements are met.

## 2.5. Diversity, equality and inclusion

We do not just sanction discrimination, we actively promote and demand diversity among our employees. With a climate of recognition and open-mindedness, we tap into entrepreneurial advantages through barrier-free cooperation not only internally, but also with an impact on external relationships.

## 3. Business ethics

We expect the highest level of legality, honesty and transparency in all business activities and relationships. We expect our business partners to do the same. We avoid any form of criminal activity, including corruption (fraud, bribery), and do not accept any form of corruption.

### 3.1. Fraud & bribery

In order to obtain orders, no employee may offer or grant improper advantages to business partners in the public and private sectors or otherwise exercise improper influence.

In this context, we expressly draw our employees' attention to the criminal nature of bribery and corruption in national and international business transactions.

Agreements with third parties (e.g. consultants, brokers, sponsors, agents or other intermediaries) may not serve to circumvent this regulation, e.g. in order to grant advantages to representatives of the public sector or employees of customers.

Sample contracts with contractual clauses to avoid such risks are made available by the contact persons provided by the management and are binding to apply.

### 3.2. Conflicts of interest

anyMOTION is loyal to its employees and expects the same attitude from its employees towards the company, its values and principles.

All employees are prohibited from requesting or accepting money, gifts or other 'favors' outside the bounds of customary business hospitality, which, when reasonably evaluated, could reasonably be expected to be used to influence business transactions.

We expect our employees to avoid at all costs situations in which their personal or financial interests conflict with those of anyMOTION. If they are confronted with a dubious transaction, they are requested to immediately seek the support of their superiors.

### 3.3. Whistleblowing

We depend on employees and third parties ('whistleblowers') to give us the opportunity to protect our requirements and to get to the bottom of questionable incidents and violations. We are grateful for reports ('whistleblowing') of actual, possible or suspected illegal actions and violations of the Code of Conduct. In doing so, we strictly adhere to the whistleblower's instructions as to what information is passed on. It is not necessary for the whistleblower to provide evidence. However, in order for us to take appropriate action, the report should be as detailed as possible and include supporting evidence, if available.

Whistleblowers may report their observations anonymously if they wish. All persons who provide a whistleblower will be protected by us against any resulting disadvantages.

## 4. Environmental protection and sustainability

anyMOTION has expressly set itself the goal of acting in harmony with our environment in all its corporate activities and thus making a decisive contribution to protecting and preserving it.

Environmental protection is also the result of our services: The transformation of formerly material bound business processes and communication measures of our clients on the basis of internet technology saves, for example, paper and transport expenses as well as the associated CO2 emissions.

Environmental protection is not limited to the results of our work: In our day-to-day business, we avoid unnecessary burdens on the environment and resources that could be claimed by our employees in the course of their work for our company.

In order to realize our claim, we have defined the following environmental guidelines as binding contents of our business policy:

- We regard all existing environmental laws and guidelines as minimum standards to be complied with, which are to be surpassed by our own objectives wherever possible.
- As a digital agency, our technical equipment is our most important asset alongside the people we employ. When purchasing and renewing the equipment we use (hardware such as computers, printers, monitors, etc.), we ensure that the products we purchase are environmentally friendly in terms of their origin, manufacturing conditions and energy efficiency.
- We consider the protection of the environment and the economical use of natural resources to be our social obligation.
- We are guided by the principle of sustainable business.
- We use energy, raw materials and water sparingly. Where, for example, tactile printouts are essential, we use recycled paper for printers. We replace resource-intensive traditional communication channels and travel as far as possible with virtual conferences in the interests of environmental protection in practice.
- We avoid environmental impacts such as waste and noise or keep them as low as possible. Separation of paper, glass and residual waste as well as recyclable waste is a matter of course for us and is practiced on a daily basis.
- We are committed to working permanently to reduce the environmental impact of our activities and, in close cooperation between management and employees, are continuously seeking improvements.
- We promote environmental awareness and environmentally friendly behavior among our employees by, for example, offering measures such as monthly passes for public transport.
- We support the use of a JobRad organizationally and financially.

## 5. Application and control of these guidelines

For our Code of Conduct to be effective, it must be understood, supported and continuously developed by all stakeholders. In addition to trust, this requires knowledge and availability of these guidelines, regular monitoring of their application and the possibility of unhindered and direct exchange on all issues and - if necessary - a reporting procedure in the event of violations against them.

### 5.1. Responsibilities

All managers are role models in the daily living of the guidelines of this Code of Conduct. They ensure that they are observed and that they are taken into account from the outset when designing new processes.

Managers are responsible for ensuring that all employees are aware of the Code of Conduct. It is the responsibility of all employees to apply these guidelines in their daily business and in the implementation of their tasks.

The right to amend the Code of Conduct is reserved to the Executive Board.

### 5.2. Reporting and continuous improvement process

The implementation of our Code of Conduct in our day-to-day business is reviewed and made measurable. The management reports once a year on compliance with and the development of results from the measures taken. In doing so, it addresses changes and compliance with the basic rules for work processes, products and services.

### 5.3. Queries & messages

Anyone who has questions about our Code of Conduct or is unsure whether a situation conflicts with this Code of Conduct should contact us. Our employees may speak with their supervisors or a representative of Human Resources. External partners and customers are encouraged to contact their direct contact at anyMOTION (see also 3.3 Whistleblowing).