

## **ADDITIVE Code of Conduct**

Key words: laws & taxes • employment rights • environmental protection • anti-corruption • donations • gifts • code of ethics • compliance

The decisions and activities of all employees working for ADDITIVE GmbH must always be determined by objectivity and integrity and be aligned with our three guiding principles of competence, quality and customer orientation.

See company profile and policies: <http://www.additive-net.de/de/unternehmen/additive-firmenprofil>

This code of conduct is followed and implemented directly by all employees, the senior management and the company management of ADDITIVE GmbH.

### **1. Respect for Laws and Taxation Guidelines**

ADDITIVE GmbH is committed to conducting its business responsibly and sustainably and to complying with the legal regulations and official rules of the countries in which it operates. Every employee is required to comply with the applicable law and the legal requirements and agreements. ADDITIVE pays its taxes to the relevant authorities on time and in full.

### **2. Compliance with Basic Employment Rights**

ADDITIVE's company management and senior management commit themselves to preserve basic employment rights.

### **3. Environment, Green Energy**

Being a modern engineering services company also means using our resources and the materials we use responsibly and sparingly. Only the conscious handling of resources allows us to use them efficiently and keep them usable as long as it makes economic sense. ADDITIVE employees are committed to the careful, conscious use of all resources in compliance with environmental protection regulations.

### **4. Anti-Corruption Guidelines**

The anti-corruption guideline's goal is to avoid conflicts of interests and, thus, fight corruption. To reach this goal, all employees are required to conduct themselves properly. This is based on the principle that employees who work for ADDITIVE GmbH must not allow that their personal interests, not even by appearance, collide with the interests of the group.

#### 4.1 Correct conduct in awarding contracts, purchasing and procurement

Our employees are prohibited from offering, promising or granting an advantage to a business partner, a public authority or their employees in return for preferential treatment in the awarding of a contract or delivery, or from allowing themselves to be promised, demanding or accepting an advantage in return for preferential treatment from a business partner, a public authority in the awarding of a contract or delivery. With the aim of avoiding conflicts of interest, the ISO 9001 guideline on procurement and supplier selection must also be taken into account in this context.

#### 4.2 Responsible handling of gifts and other benefits

##### 4.2.1 Gifts

Gifts are all benefits of value that are given by or to third parties. A distinction must be made between gifts of money and gifts in kind. All gifts of money are prohibited, regardless of value, form or currency. Gifts of money are amounts in any form and currency. This includes cash gifts or corresponding gifts such as securities, gift certificates or discounts on goods or services that are not available to the general public or employees.

On principle, employees of ADDITIVE GmbH aren't allowed to give or accept gifts in kind. Gifts in kind are any items of value, including promotional gifts. Exceptions to this fundamental prohibition are reasonable gifts in kind given for official purposes, the acceptance of which does not place the recipient under any obligation. The recipient and donor must avoid any appearance of dishonesty or impropriety. If the value of the gift exceeds EUR 35 per person and official occasion, this appearance is no longer deemed to have been maintained. Gifts with a value exceeding EUR 35 aren't allowed to be accepted or offered on principle. However, even below EUR 35, it must be considered in each individual case whether a gift in kind is appropriate to the situation or whether there is already a conflict of interest by accepting or giving the gift.

## ADDITIVE

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The frequency of gifts given or received from the same source is also a factor to be taken into consideration. In case of doubt, the management must be informed.

### 4.2.2 Other benefits

Other benefits from or to third parties, such as business meals, entertainment or the associated accommodation costs, are only permitted if they are justified and motivated by official business. They must be proportionate to the business occasion in every respect. An obligatory dependency or the appearance of dishonesty or impropriety on the part of the recipient or the giver must not be created. Impermissible benefits must be rejected immediately. In cases of doubt, the senior manager must be informed and the decision obtained from the company management.

### 4.2.3 Clear separation of business and private areas

If gifts in kind or benefits are granted or accepted in an environment in which business and private matters are so intermingled that it is not possible to make a clear distinction, the costs of benefits and gifts must be defrayed privately in their entirety.

### 4.3 Donations and sponsoring

Donations and sponsoring are exclusively managed by the company management of ADDITIVE GmbH. Donation and sponsoring activities, both, must be designed in a manner that avoids conflicts of interests and, thus, contribute to the abatement of bias and corruption.

## **5. Health Protection and Safety of Employees**

The ADDITIVE GmbH is aware of its responsibility to protect people's health and safety. The company management of ADDITIVE, together with its senior management, is committed to this in form of health programs and occupational health and safety measures.

## **6. Equal Treatment of Employees with Regard to Remuneration**

ADDITIVE pays its employees in respectively comparable positions with the same level experience a performance-related remuneration regardless of their gender or age.

## **7. Prohibition of Child Labour**

Only workers who are at least 15 years old and have the required skills and prior knowledge may be employed.

## **8. Suppliers**

For the products offered by ADDITIVE, more than 90% of all transactions have only one supplier, who is also the manufacturer. Effectively, the manufacturers have bound themselves to ADDITIVE in our market, and vice versa. As a consequence, we must work very closely with the respective manufacturer. Accordingly, an alternative in terms of supplier selection doesn't exist. Nevertheless, ADDITIVE – in line with ISO9001 reviews – undertakes a regular evaluation of its suppliers to optimize the processes.

## **9. Reporting Conflicts of Interests**

ADDITIVE's company management obliges all of its employees to report any conflicts of interest to their senior managers immediately. This also includes any conflicts employees get into unintentionally due to professional or personal relations to customers or external service providers.

More about the company ADDITIVE:

<http://www.additive-net.de/de/unternehmen>