

## **Supplier Code of Conduct Code of Conduct for our Business Partners**

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## **1 Preamble**

### **1.1 Introduction**

Economic success and social responsibility are inseparable. Responsible and ethical behaviour towards employees, business partners, society and the environment is an integral part of facts and fiction's value system. Compliance with the law in our business activities is a given for us.

These convictions must also be expressed in the relationships we maintain with business partners. The Supplier Code of Conduct therefore sets out binding minimum requirements for the business relationships with facts and fiction. The continuity and further development of successful business relationships depend to a large extent on a shared commitment to integrity and responsible entrepreneurship. We expect our business partners to observe and implement the standards of this Supplier Code of Conduct. We would like to thank all our business partners who join us in promoting responsible and ethical behaviour in business.

Our Supplier Code of Conduct is based on the principles of internationally recognised standards for responsible corporate governance. These include standards such as the Global Compact of the United Nations (UN), the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD) and the labour and social standards of the International Labour Organisation (ILO).

### **1.2 Validity of the Supplier Code of Conduct**

Business partners as defined in this Supplier Code of Conduct, from whom we expect compliance with our standards set out herein, are deemed to be all the third parties who work for, on behalf of or together with facts and fiction. These include suppliers, subcontractors and freelancers.

## **2 Integrity**

### **2.1 Compliance with applicable law**

#### **Our business partners comply with applicable law at local, national and international level.**

/ Compliance with all applicable laws and regulations is a given for us. We expect the same from our business partners. This is the only way to ensure a trusting and long-term business relationship.

/ All business partners independently familiarise themselves with the basic laws, regulations and guidelines that are relevant to their respective activities for, together with or on behalf of facts and fiction.

/ Individual countries, business areas or markets may have stricter regulations than those described in this Supplier Code of Conduct. In such cases, the stricter regulations will apply.

/ In particular, our business partners comply with foreign trade regulations. National and international laws regulate the import, export or domestic trade of goods, technologies or services, the handling of certain products as well as capital movements and payment transactions. Appropriate measures must be taken to ensure that transactions with third parties do not violate applicable economic embargoes or regulations on trade, import and export controls or combating the financing of terrorism.

### **2.2 Protection against corruption and bribery**

#### **Our business partners condemn all forms of corruption and bribery.**

/ Our business partners are prohibited from engaging in any form of bribery or corruption, whether by public officials or in business dealings.

/ Our business partners only provide benefits, for example in the context of invitations or in connection with advertising measures, donations and sponsorships, within the legally permissible framework permissible framework.

## **2.3 Protection of assets and property**

**Our business partners condemn any form of fraud and other asset-compromising behaviour towards facts and fiction and third parties.**

/ Any form of fraud or asset-compromising offences (e.g. fraud, breach of trust, theft, embezzlement, tax evasion or money laundering) is prohibited, regardless of whether this compromises facts and fiction's company assets or the assets of third parties.

## **2.4 Fair competition**

**Our business partners comply with applicable antitrust and competition law.**

/ Our business partners are committed to fair and unrestricted competition as the fundamental principle of a free economy. They refrain from anti-competitive agreements with competitors, suppliers, distributors, dealers and customers as well as generally anti-competitive practices.

## **2.5 Protection of intellectual property**

**Our business partners respect and protect intellectual property of all kinds.**

Intellectual property refers to all products of intellectual work, irrespective of its commercial value. This includes concepts, storyboards, design concepts, architectural designs, renderings and software. Intellectual property is protected by law (e.g. by copyright, trademark, design or patent rights) as a trade secret or know-how.

Infringement of protected intellectual property includes, for example, the performance, distribution or exhibition of copyrighted works without the appropriate authorisation and the unauthorised reproduction or distribution of copies of intellectual property, regardless of whether this is done in physical or digital form.

As a creative agency, the protection of intellectual property is of fundamental business importance to facts and fiction and is therefore also expected from our business partners.

## **2.6 Data protection**

**Our business partners comply with the applicable laws and regulations when collecting, storing, processing or transferring personal data and information.**

/ When collecting, storing, processing or transferring personal data (e.g. name, address, telephone number, date of birth, health information) of employees, customers or other third parties, our business partners ensure the utmost care and strict confidentiality as well as compliance with applicable laws and regulations.

## **2.7 Financial integrity**

**Our business partners conduct their business, document retention and financial reporting properly.**

/ Business transactions, assets and liabilities are recorded and documented in accordance with legal requirements.

/ Documents relevant to financial accounting must not be deliberately provided with false or misleading entries. Any form of balance sheet manipulation is prohibited.

## **2.8 Conflicts of interest**

**Our business partners disclose potential or actual conflicts of interest and resolve them as quickly as possible.**

/ Business partners who are impacted by a potential or actual conflict of interest in their activities in relation to facts and fiction are obliged to disclose and resolve this immediately.

## **2.9 Confidentiality and business information**

**Our business partners protect confidential information from unauthorised disclosure and misuse, as well as the reputation of facts and fiction in statements made publicly.**

/ Our business partners ensure that confidential information and data is stored carefully, not passed on or made accessible to unauthorised persons and used exclusively for the agreed business purposes.

/ Discussing confidential information in public and on social media or the unauthorised disclosure of information about the company or its customers to third parties, such as the media or the competition, constitutes a breach of confidentiality and may be a violation of antitrust law, among other things.

## **2.10 Information security**

**Our business partners use information provided to them by facts and fiction exclusively for the fulfilment of their tasks within the scope of the services for facts and fiction and protect it from internal and external misuse.**

In day-to-day business, sensitive information is regularly used and processed using IT systems. Appropriate security measures (processes, registered technologies and licensed software) are required to ensure the protection of intellectual property and personal data. Disregarding the necessary security measures can have serious consequences, such as data loss, theft of personal data or copyright infringement.

/ Our business partners undertake to use the information provided by facts and fiction only for the performance of existing agreements with facts and fiction and not for their own or personal purposes that are inappropriate or unauthorised, or for unethical or illegal activities.

/ It is the responsibility of our business partners to ensure that all necessary measures are taken to ensure the protection of sensitive information from internal and external misuse and threats.

## **2.11 Insider trading**

**Our business partners comply with the laws on insider trading.**

/ It is prohibited by law to use insider information when trading in securities or other tradable financial instruments and to disclose insider information to third parties for the same purposes.

/ Insider information is deemed to be specific information about circumstances that are not publicly known and which, if they become publicly known, could significantly influence the price of securities or similar financial instruments. Examples of such circumstances may include increases or decreases in profits, major orders, plans to merge with or acquire a company, significant new products or changes in management personnel.

/ If our business partners become aware of such information, they will handle it in accordance with insider trading regulations.

## **3 People**

### **3.1 Human rights**

**Our business partners respect and support the protection of universally recognised human rights and ensure that they are not complicit in human rights violations.**

/ Our business partners are committed to the principles of the Universal Declaration of Human Rights, the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the core labour standards of the ILO.

### **3.2 Prohibition of forced and child labour**

**All forms of forced and child labour at our business partners are prohibited.**

/ Our business partners do not tolerate child labour within the meaning of Conventions 138 and 182 of the ILO and national laws. The minimum age of children or adolescents for employment or work must not be below the age at which compulsory schooling ends locally.

/Forced labour, i.e. any work that is demanded of a person against their will and under threat of punishment, as well as modern forms of slavery and human trafficking, are also not tolerated by our business partners.

## **4 Environment**

### **4.1 Responsible use of natural resources**

**Environmental and climate protection as well as the responsible use of natural resources are an essential part of our business partners' responsibility towards the environment and society.**

/ Our business partners comply with applicable environmental protection regulations, in particular with regard to operational and product-related environmental protection.

/ facts and fiction expects its suppliers to use and procure natural resources responsibly.

## **5 Implementation**

### **5.1 Implementation of the Supplier Code of Conduct**

**Our business partners guarantee that they will implement and comply with our Supplier Code of Conduct in the contractual relationship with facts and fiction.**

/ Our business partners guarantee that they will comply with the minimum standards of this of this Supplier Code of Conduct in the contractual relationship with facts and fiction.

/ To this end, our business partners will pass on the values and principles of the Supplier Code of Conduct to their employees who work for facts and fiction and ensure compliance therewith.