



# Code of Conduct

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## Why We Have a Code of Conduct

Trust is the key to everything we do and fundamental to our long-term success.

It is our responsibility to live according to the spirit of this Code of Conduct to ensure we are trusted by our customers, colleagues and business partners, who all share the same values. It defines what we expect from every person working for and with Cataligent, and also highlights the responsibility that we carry.

The Code of Conduct helps us all to make better decisions and raises our awareness for legal risks within our work.

## What Is the Code of Conduct?

The Code of Conduct is our central policy document, serving as a common guideline for decisions and actions that every single person working for and with Cataligent must comply with. It delineates binding minimum standards for responsible behavior towards our business partners, as well as for our internal behavior.

Of course, it is possible that you may also have additional policies you need to adhere to. Since our Code of Conduct cannot cover all the laws and regulations, make sure you are always familiar with relevant laws that apply to your place of work.

## Speak Up

In order to preserve our values, it is essential that we are all aware of the regulations relevant to our fields of work and take personal responsibility for abiding by them.

In case you notice behavior at work that seems to be a violation of our Code of Conduct, illegal or unethical, please report it. Any breach of our systems, processes or policies, such as bullying, bribery, conflicts of interest, price fixing or the abuse of human rights, must be reported.

The company and its management therefore have the responsibility to create an honest environment in which delicate issues can be discussed openly and without any fear of retaliation.

## General Conduct

### Conflicts of Interest

We always try to ensure that our own interests do not interfere with the interests of the company.

If you find yourself in a situation in which a decision that is in the best interest of the company, but potentially comes into conflict with your personal interests, you are required to disclose this potential or real conflict of interest to your manager for an immediate resolution.

### Gifts and Hospitality

In many cultures the giving and accepting of gifts and hospitality has an important role in developing and encouraging business relationships and is generally permitted. However, we prohibit the giving or receiving of any gift or hospitality that is excessive or undue, since this can improperly influence the behavior of the recipient. Common courtesies are allowed as long as they are not made with the objective of influencing existing or potential relationships and decisions, do not create conflicts of interest and are always made transparent by registering all items given or received.

In this understanding, always ascertain carefully if a gift or entertainment is excessive or comes with obligations, in order to prevent unethical business at Cataligent.

### Travel and Expenses

Always try to find the right balance between business need, environmental impact, financial cost and your personal health and well-being when travelling. Stay cost conscious and solely claim necessary and reasonable expenses for business purposes, such as appropriate classes of travel and hotels.

### Mutual Trust and Respect

Every person is entitled to a fair and respectful treatment and obliged to treat others in the same way. We are committed to equal opportunities and encourage a diverse working environment in which each person is treated with courtesy and honesty, and collaborative efficiency is rewarded. Since we assemble our team based on talent, we do not tolerate any harassment, bullying or discrimination in our everyday work, as well as in recruiting and hiring processes because of race, gender, national or ethnic origin, age, religion or belief, sexual orientation, disability or any other characteristic specified under applicable anti-discrimination law.

### Protection of Company Assets

We value and maintain the responsible use and handling of company assets such as our products, work materials and equipment or intellectual property of our employees. In this understanding, company assets should be used only for their intended business purposes. Any form of improper use or fraud for personal or other unauthorized purposes is prohibited.

## Compliance with the Law

We comply with all applicable domestic and international laws and appropriate standards. All employees are therefore obligated to be familiar with the basic laws and regulations that are relevant to their area of responsibility.

### Insider Dealing

The law prohibits people to profit from insider dealing. This includes concrete information with high price sensitivity about any circumstance that is not publicly accessible, but which you have access to, used for trading of securities or other financial instruments. Since this information, if made public, could have a severe influence on the values of those securities and compromises our integrity, it is prohibited to deal with this information, even after you stopped working for Cataligent.

### Bribery and Corruption

We condemn all forms of bribery and corruption in every kind of commercial setting. Bribery is the giving of something of value such as facilitation payments, certain gifts and hospitality or other forms of illegitimate business expenditures that aim at obtaining an improper advantage. Moreover, caution should be taken when requests are made for sponsorship since even charitable donations can be seen as bribery.

Corruption is any abuse of public power or resources for a personal gain.

We commit ourselves to a corporate culture that prevents bribery and corruption and do not tolerate any activity that gives us an improper commercial advantage.

### Fair Competition

We are committed to a free and fair competition. We therefore abide by the laws that prohibit relationships or arrangements with competitors, which may affect competition in the marketplace and can apply both to Cataligent and other companies. You should never accept confidential information from competitors or encourage others to do so, agree on price-fixing or other unfair methods of competition.

### Minimum Age Limits

Child labor or other exploitation of children is not accepted, regardless of the country of business activity. The applicable national and international laws for the protection of young people are strictly observed.

### Wages and Payment

For all work provided, at least the legal minimum wage shall be paid, regardless of the wage system (e.g. payment by piece, production, task, hour or month).

## **Handling of information**

### **Confidentiality and Data Protection**

Our customers and employees expect us to handle any confidential information and personal data cautiously and in accordance with applicable data protection laws. We therefore comply with appropriate safeguards for the protection of private and business information we collect, retain, use or transmit.

Confidential information is information that is exclusively intended for the named recipient(s), not for internal or external dissemination. This may involve but is not limited to records, reports, contracts, personnel and financial data, evaluations, business plans in digital, physical or any other form.

### **Statements Regarding Products and Services**

We always make truthful statements about our products and services in order to maintain the company's reputation and meet the expectations of our customers. Any misleading or false information, regardless of the reasons for a false statement, violates our company values and is prohibited.

### **Information Technology**

We use information technology and web-based applications on a daily basis. This demands appropriate security practices such as password protection and licensed software in order to protect our own intellectual property and personal data as well as any data of our customers. We therefore commit ourselves to using any technology for business purposes only and are always aware that workplace related technology is company asset, which has to be protected against internal or external misuse and threats.