



## CODE OF CONDUCT

### INTRODUCTION

We are convinced that shared values and a good understanding of the desired behaviors form an important basis for trusting and lasting relationships - if its with our customers, our employees, business partners and other stakeholders.

We see clarity about the values we stand for and the behaviour we advocate as an essential prerequisite for mutual success. In our corporate culture trust, respect, sustainable work and a commitment are standing above all. This is the basis of our business philosophy.

This Code of Conduct serves as a guideline for our employees and partners and sets out our binding ethical and professional standards. It expresses to our customers and other stakeholders that we are committed to principles of conduct and will comply with.

We want to keep these guidelines in mind at all times. The Code of Conduct is not just any of our internal rules, it reflects the basic understanding with which we appear and act at INNOVATOR Group, and shows how we want to be perceived.

It is the responsibility of every employee to be familiar with the Code of Conduct. The principles should not only be implemented according to the letter, but also according to their meaning and spirit in our daily work. In this way, we speak the same language throughout the world and can achieve further success together. We thank everyone for their contribution.

**OUR BEHAVIOUR AND INNOVATOR GROUP'S  
SHARED GOALS THE CODE OF CONDUCT IS AN  
EXPRESSION OF OUR VALUE-BASED ATTITUDE.  
WE ALIGN OUR ACTIONS WITH IT IN ORDER TO ACHIEVE OUR  
COMMON GOALS AND LONG-TERM SUCCESS.**

We want to create, maintain and expand lasting value for our company as well as for our customers and employees.

We manage our company responsibly and show ourselves to be a partner of integrity in all relationships.

We value our employees and colleagues, create an attractive working environment and promote an open, friendly and performance-oriented corporate culture.

We maintain lasting, fair relationships with our customers, business partners, and other important stakeholders.

We take risks in a measured manner.

We use resources carefully and try to meet the demands of society and the environment as best we can.

## WE COMMIT

**THE CODE OF CONDUCT IS BINDING. IT SETS OUT OUR PRINCIPLES OF CONDUCT FOR BUSINESS ACTIVITIES AND FOR DEALING WITH ALL STAKEHOLDERS AS WELL AS WITH SOCIETY AND THE ENVIRONMENT.**

All employees at INNOVATOR Group and its affiliated companies are required to read and understand the Code of Conduct and to comply with it at all times.

Managers exemplify the values and principles of the Code of Conduct and promote a working environment that ensures compliance with the established principles.

Compliance with the Code of Conduct is an integral part of the contractual relationship under employment law, the agreement on objectives and the performance appraisal of employees.

Violations of the Code of Conduct may be punished with disciplinary measures and consequences from labor law, up to and termination of employment without notice. Employees who observe behaviors which are considered to be a breach of duty in relation to the Code of Conduct or a regulatory requirement are requested to inform the management. Employees may also contact the Whistleblowing Unit confidentially or anonymously.

## HOW WE MANAGE OUR COMPANY

**EFFECTIVE CORPORATE GOVERNANCE IS AN ESSENTIAL PART OF OUR BUSINESS CULTURE AT ALL LEVELS.**

Corporate management bodies ensure rigorous adherence to all applicable laws, rules and regulations and do not tolerate any violations.

Corporate management has an efficient risk management system and ensures effective control. It promotes the competence and independence of Internal Audit.

When recruiting and managing personnel, employees at all levels must draw attention to conflicts of interest that may arise from their personal relationships.

Employees with management functions bear a special responsibility. Within their area, they are responsible for establishing a constructive and good working climate as well as appropriate processes that enable flawless business processes.

Employees at all levels behave correctly and respectfully at all times, both within the company and externally, and refrain from any discrimination. We do not tolerate any abuse of power. This applies in personal conversations as well as in correspondence on social media.

We set incentives in such a way that they promote compliance with the principles set out in the Code of Conduct and comply with the applicable legal and regulatory requirements.

We demonstrate responsibility in all our actions and decisions and act as a credible company.

We use the company's systems and resources with care.

## OUR EMPLOYEES

**COMPETENT, RADICALLY OPEN-MINDED AND PERFORMANCE-ORIENTED EMPLOYEES ARE THE BASIS OF INNOVATOR GROUP'S BUSINESS SUCCESS. WE HIGHLY VALUE THEIR COMMITMENT AND OFFER THEM AN ATTRACTIVE, SAFE AND HEALTHY WORKING ENVIRONMENT.**

We offer equal opportunities for employment and promotion regardless of gender, age, religion, nationality, ethnic background, sexual orientation, marital and family status, physical abilities or other characteristics.

We do not tolerate any forms of discrimination, harassment or bullying in our work environment.

We treat each other with respect and respect different opinions, perspectives or cultural practices. We place particular value on good communication and cooperation. We promote a collegial working atmosphere and a culture of open discussion in which questions and concerns can be freely expressed and are welcome.

We refrain from statements and behaviour that might be harmful to INNOVATOR Group and contradict our values when dealing with the public, especially in the press or on social media.

Supervisors are required to regularly provide their employees with honest and transparent assessments of their personal performance.

We provide employees at all levels with access to management.

## OUR CUSTOMERS

**WE ARE COMMITTED TO LONG-TERM, TRUSTING RELATIONSHIPS WITH OUR CUSTOMERS. THEIR SATISFACTION AND SECURITY IS CENTRAL TO US.**

We strive to offer our customers first-class products and services as well as the best possible advice and execution of orders. We take the best possible care of our customer's interests and avoid any conflicts of interest. We apply a fair and transparent pricing policy.

We attach importance to comprehensible and transparent communication with our customers. We do not promise anything that we cannot deliver. We take feedback seriously and use it to continuously improve our services and products.

We place the highest priority on discretion with regard to our customers and treat protected customer information confidentially, both in personal dealings and in digital processing, within the framework of the applicable laws. We follow the highest standards to protect customer information from unauthorized or improper access and to ensure our customers' privacy rights.

Customer data is disclosed only as provided for in the General Terms and Conditions, for example due to statutory disclosure requirements. Within the bank, customer information is only accessible to the extent necessary for the provision of services.



We are open to new technological developments and use them for the benefit of our customers and for the continuous optimization of our operating processes. We consciously and carefully weigh any associated risks and take appropriate precautions where necessary.

## HOW WE CONDUCT OUR BUSINESS

### PROFESSIONALISM, FAIRNESS AND INTEGRITY CHARACTERIZE OUR BUSINESS POLICY.

We comply with applicable laws, regulations and rules in all countries where we operate locally. We avoid business that jeopardizes INNOVATOR Group's reputation or whose consequences we cannot assess.

In case of doubt, we involve our superiors or the Compliance or Legal Department. We do not gain unfair competitive advantages, for example by misrepresenting and concealing facts or manipulating, concealing or misusing privileged information. We neither offer nor accept inappropriate gifts, invitations or other favours in the context of business relationships. We do not tolerate corruption or bribery.





## OPEN QUESTIONS

IF YOU HAVE ANY QUESTIONS OR UNCERTAINTIES,  
PLEASE DO NOT HESITATE TO CONTACT US.

The Code of Conduct cannot cover in detail all aspects that you may encounter in your working environment. Therefore, act not only according to the letter of the Code of Conduct, but also according to its spirit.

Listen to your inner feeling, use your common sense and show a sense of responsibility.



A stylized, handwritten signature in white ink, appearing to read 'D. Bakir'.

Dr.-Ing. Dennis Bakir  
CEO of the **INNOVATOR** Group