

Code of Conduct

This Code of Conduct describes the behaviour we expect from our staff and employees towards each other and towards our candidates, participants in training courses and business partners - customers, suppliers and all others whose cooperation we have.

The expected behaviour for suppliers who have a business relationship with the Amadeus Fire Group is described in the „Supplier Code of Conduct“.

Our human rights strategy is set out in the „Declaration for Human Rights“ and our approach to the environment is set out in our „Environmental Policy“.

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1. Introduction

1.1. Applicability

This Code of Conduct applies to all employees of the Amadeus Fire Group, including all affiliated companies, as well as to all entities providing services on behalf of the Amadeus Fire Group.

1.2. Commitment to comply with international standards & conventions

Compliance with applicable laws and regulations ranks as our top priority. All business activities and the associated expectations of the company are characterised by national laws and regulations, but also increasingly by international standards and conventions.

We are committed to the key principles outlined in international conventions including the International Bill of Human Rights, the UN convention on the elimination of all discrimination against women, the United Nations guiding principles on business and human rights, the UN convention on the rights of the child and the core labour standards of the International Labour Organization (ILO). These include, for example, the declaration on fundamental principles and rights at work and Convention 181 on private employment agencies.

To this end, we are fully committed to the following fundamental principles and rights at work:

- Freedom of association and actual recognition of the right to collective bargaining
- Abolition of all forms of forced and compulsory labour
- Effective abolition of child labour
- Elimination of discrimination in respect of employment and occupation

1.3. Integral and compliant behaviour

The Amadeus Fire Group focuses business actions and decisions on universally ethical values, especially integrity, credibility and respect for human dignity, as these values are the key to our sustainable success and constitute the basis of our culture.

This allows us to promote transparency, responsible management and control in an appropriate manner. Specifically, our approach involves:

- We fully comply with all applicable laws and regulations throughout and use our best judgement when making decisions.
- We demonstrate trust and honesty both within our company and with our candidates, customers and suppliers. We are conscious of being judged by these standards every day.
- We treat one another with dignity and respect and contribute to an inclusive working culture where each individual feels valued and a key part of the Amadeus Fire Group.
- We maintain our knowledge at an ongoing level by regularly attending training courses on important topics. These include the areas of compliance, data protection, diversity and inclusion, IT security and health and safety.
- In case of any uncertainty, we contact our line managers, the compliance officers or the HR or legal department.

1.4. Behaviour of line managers

Line managers hold a key role in establishing a culture within and between departments that is characterised by mutual respect. This entails the following responsibilities for line managers:

- Leading by example by demonstrating the expected behaviours and values of the Amadeus Fire Group.
- Foster an atmosphere of open communication and respectful and inclusive dialogue within and between departments and teams, addressing ethical issues and concerns.
- Emphasising the importance of doing business ethically and legally every day.

1.5. Reporting of incorrect behaviour

All employees of the Amadeus Fire Group are encouraged to report any actual or suspected misconduct of which they become aware in the course of their professional activities immediately by using the reporting channel available to the public at <https://group.amadeus-fire.de/en/the-group/whistle-blower-system/>

Reports of a violation of this code will be kept strictly confidential and will have no negative consequences for the reporting employee.

1.6. Guidance on acting with integrity

There are situations where the law provides insufficient guidance. We might be unaware of the ethical implications of our behaviour and unsure whether we are acting with integrity. The following questions can provide guidance.

- Would I feel comfortable if I was treated in the same way?
- Is my behaviour in accordance with the applicable laws, this Code of Conduct and our guidelines?
- Is that the right thing to do?
- How could my behaviour affect candidates, colleagues, employees, business partners or shareholders?
- What would my family and friends think about my behaviour?
- Would I feel comfortable reading about my behaviour on social media or in the newspaper?

1.7. Consequences of violations

The Amadeus Fire Group tolerates no violations of laws, regulations, this Code of Conduct or internal policies and guidelines at any time. Non-compliance with these regulations may result in sanctions up to dismissal as well as criminal or other legal consequences in accordance with applicable law.

2. How employees interact amongst themselves

2.1. Prohibition of discrimination and harassment

All individuals have the right for fair, dignified and respectful treatment. The Amadeus Fire Group is committed to diversity, inclusion and equal opportunities and stands for a working environment in which everyone is valued and characterised by respect and tolerance. Sexual harassment, discrimination, racism, bullying, abuse of power, intimidation or threats and other forms of harassment are not tolerated and will be prosecuted under civil and criminal law without exception.

No discriminatory practices on racial or ethnic basis, colour, gender, sexual orientation, gender identity, disability, age, religion, political opinion, national origin, social origin or any other grounds covered by the prohibition of discrimination will be tolerated.

2.2. Compliance with human and labour rights

The success of the Amadeus Fire Group begins and ends with its own employees. Ensuring and respecting human and labour rights are fundamental principles of our business activities. We are obliged to conduct our business in a manner that respects the rights and dignity of all individuals. Forced labour, child labour, all forms of modern slavery and human trafficking as well as any form of exploitation are strictly prohibited.

As a provider of personnel services and training, we reject the charging of fees to applicants.

We recognise the right of all employees to establish collective bargaining and employee representation on a democratic basis within the context of national regulations. The right to adequate remuneration and the limitation of daily or weekly hours of work is recognised for all employees and is based on the applicable statutory and collectively agreed regulations.

2.3. Treatment of business secrets and protection of personal data

The Amadeus Fire Group is strongly committed to ethical and fair business practices and recognises the importance of respecting the intellectual property rights, trade secrets and confidential information of third parties.

Protected intellectual content is defined as all products of intellectual work, regardless of their commercial value. This includes, for example, literary and journalistic works, graphic works or software and their components.

Intellectual property is legally protected (e.g. by copyright, trade mark or patent rights) or as a trade secret.

The protection of this information should be ensured by each individual employee. Any confidential information relating to the company must be strictly kept secret. This kind of information should not be passed on to unauthorised persons, including family and friends. Files and records must be protected from unauthorised access. Passwords must be chosen in accordance with security guidelines, and changed regularly and must never be passed on to other people, not even within the department.

Ensure that no third party can access data when the workplace is temporarily unattended. Any conversations with confidential information need to be held in a way that prevents unauthorised persons from gaining knowledge of them. In particular, to conversations over the telephone or notebook loudspeaker and video conferences. Confidential information may only be used for business purposes.

Data security is of utmost importance to the Amadeus Fire Group. This influences commercial success and public reputation. We recognise the sensitive nature of the personal data entrusted to us by our customers, business partners, employees and shareholders and protect these by treating them carefully and responsibly. We use all suitable and appropriate technical and organisational resources to protect this data from unauthorised access, unauthorised and improper use, loss and accidental deletion, ensuring the constant confidentiality of this data. Compliance with the relevant regulatory framework and national laws as well as internal guidelines and regulations is ensured. Each individual is responsible for ensuring a high level of protection within the Amadeus Fire Group as part of their duties. The employees comply with the data protection regulations and, in particular, respect and observe the extensive rights of the persons whose data they collect, process and use.

2.4. Health and safety at work

Preventing accidents and health problems at work is a major concern for the Amadeus Fire Group. We are aware a vital, healthy workforce brings benefits for people, the economy and society. For this reason, we refuse to compromise on measures for health, safety and well-being. We ensure that colleagues and employees operate in a working environment that meets all applicable standards. In this context, we regularly conduct health and safety trainings. All of our employees encourage health and safety in their working environment and comply with health and safety regulations. Everyone behaves prudently to prevent danger to all. All incidents endangering safety need to be reported immediately to the respective line manager. In the event of a hazardous situation, the underlying problem has to be eliminated without delay and colleagues must get informed accordingly. Every line manager is obliged to instruct and support their employees in the fulfilment of this responsibility.

3. Behaviour in the business environment

3.1. Complying with due diligence obligations through regular risk assessment

As part of the Amadeus Fire Group's due diligence obligations as a provider of personnel and training services, regular identification and assessment of risks of all kinds is essential to ensure business continuity.

Adequate and customised measures and procedures implemented to the best of our knowledge and belief can prevent the occurrence of potential dangers and counter serious hazards that could endanger the ongoing existence of the Amadeus Fire Group.

In addition to a group-wide risk management system organised on an ongoing basis to identify and assess risks of all kinds, further risk management processes are in place for specific phases of business activities in which an increased probability of the occurrence of associated risks arises. This applies in particular to the recruitment of employees, their integration into labour relations or the onboarding of suppliers.

In order to ensure the maximum degree of transparency with regard to our risks and how we deal with them, we report all identified and relevant risks, their probability of occurrence, the expected risk severity if any occur, and potential and actual remedial measures to minimise risk in our annual report.

3.2. Relations with customers and business partners

Every employee of the Amadeus Fire Group needs an awareness of their role as representatives for customers and business partners. This enables identification, so that our image is presented to the outside. Our external image is reflected in the appearance of our employees. An inappropriate appearance and behaviour damaging to our reputation will not be accepted. By promoting our positive public image through the work of every employee, we also support our economic success.

Business partners and customers of the Amadeus Fire Group expect us to act in compliance with the applicable regulations at any time. This requires full awareness of our contractual obligations. The identity and integrity of potential business partners and customers are checked carefully. If inappropriate or illegal behaviour emerges during this process or in the course of subsequent collaboration, the advice of the compliance officers must be sought immediately.

We ensure fairness and integrity in our purchasing decisions based on objective criteria like quality, price, service, reliability, availability, technical performance, contract fulfilment, resource and energy efficiency and environmental compatibility. Through appropriate measures, we ensure that business transactions with external parties comply with applicable economic embargoes, sanctions lists, trade, import and export control regulations or regulations to combat the terrorism financing.

3.3. Legal compliance and prohibition of unlawful practices

Compliance with applicable laws and regulations is essential for the Amadeus Fire Group to operate in an economically responsible manner. We always observe the applicable legislation and obligations, irrespective of whether this entails short-term economic disadvantages or difficulties for the company or individuals. Any activity contrary to the law is prohibited without exception.

3.4. Avoiding conflicts of interest

Business decisions within the Amadeus Fire Group are taken in the best interests of the company. Conflicts of interest with regard to private interests or other economic activities should be avoided from the outset, including those of family members or other related persons or organisations. In case they do occur, they must be resolved in accordance with the law and the applicable guidelines. The conflict must be disclosed transparently.

3.5. Assurance of fair competition

The Amadeus Fire Group commits to the principles of fair competition. We are committed to ensure our success is based on the competence of our offering. We neither enter into agreements nor engage in behaviour that unfairly restricts competition or through inappropriate coordination or collusion with our competitors. As a result, no agreements are entered into with our competitors regarding the business conditions for our customers or applicants and no competitively relevant information is exchanged about our behaviour on the market. This implies not agreeing with our competitors on how we divide up customers, business opportunities or regions or allocate them to one another.

3.6. Prevention of corruption and antitrust violations

Corruption and antitrust violations undermine the Amadeus Fire Group's high reputation and sustainable economic success in national business competition. Therefore, this is never tolerated (zero tolerance). Kickbacks or cartel agreements are no way for us to obtain a contract. Breaches are not tolerated and lead to penalties against the individuals concerned. All board members and managing directors, all line managers and all other employees should be aware of the extraordinary risks that a corruption or cartel case may entail. Within one's area of responsibility, every employee is called upon to contribute actively to the prevention of activities of this kind.

3.7. Non-tolerance of money laundering

No money laundering is tolerated by the Amadeus Fire Group. We require all employees to comply strictly with the laws on combating money laundering so that we do not participate in any activities involving this. Furthermore, suspicious forms of payment or other transactions indicating money laundering must be reported immediately to the compliance representatives or a managing director.

3.8. Usage and disclosure of insider information

As the Amadeus Fire Group is aware, the usage and disclosure of insider information is prohibited by law. Insider information is any precise information which is not publicly known, relates directly or indirectly to an issuer or its financial instruments and is suitable, once known, to significantly influence the price of these financial instruments (e.g. Amadeus Fire shares) or related financial instruments. Employees possessing insider information may not buy or sell these financial instruments for their own account or for that of third parties using the insider information (or change or cancel a buy or sell order that has already been placed). Nor may the information be unlawfully passed on or made accessible to third parties. The restriction applies until the information no longer qualifies as insider information, for example because it loses its relevance to the share price or is publicly disclosed. Members of the Management Board and Supervisory Board of the Amadeus Fire Group are not permitted by law to engage in direct or indirect transactions for their own account in shares or other financial instruments of the company prior to the publication of business figures.

4. Social interaction and protection of the environment

4.1. Perception of social responsibility

With the Amadeus Fire Group positioned at the core of society as a provider of personnel services and training, we are committed to ensure our company contributes positively to a more inclusive society and working environment. As a dedicated member of society, we perceive our social responsibility. Based on applicable laws and internal guidelines and regulations as well as our own financial resources, we are a broad-range sponsor in various fields. These primarily include sport and education. These sponsorships occur through co-operations, monetary and material donations as well as services. No donations are granted by the Amadeus Fire Group in order to obtain business advantages. Donations to individuals, to private accounts and to persons or organisations contrary to our interests or damaging to our reputation will not be granted.

By focusing on talent, skills and employability in the labour market, we contribute to prosperity, livelihoods and security and support the ambitions and goals of the United Nations Sustainable Development Agenda. Our core business and global and local community initiatives support the integration of groups at risk of exclusion into the labour market and ensure the resilience and ability to work of employees. We ensure that any charitable contributions or donations are only provided with the authorisation of the respective Board member and in accordance with the applicable regulations.

4.2. Responsibility for nature and protection of the environment

The protection of the environment and climate as well as resource efficiency are key concerns for the Amadeus Fire Group. An important part of our business activities involves minimising the negative impact of our own operations on the environment and climate whenever possible. We recognise our responsibility to preserve nature as the basis of life and to protect the environment. For this reason, we participate in finding solutions to related problems and are committed to promoting the transition to an environmentally friendly economy through our core business segments of personnel services and training. To this end, all our employees are required to handle energy, water and raw materials sparingly and efficiently and thereby contribute to protecting the environment and climate through their individual behaviour. Further details are available in our Environmental Policy.