

# SYZYGY GROUP

## SYZYGY GROUP Code of Conduct

As of June 2024

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# SYZYGY GROUP

## Introduction

SYZYGY AG and its affiliated companies – the SYZYGY GROUP – are committed to acting ethically in all aspects of their business activities and meeting the highest standards of honesty and integrity. Our Code of Conduct provides a common basis for our actions and is available on the SYZYGY GROUP website ([syzygy-group.net](http://syzygy-group.net)). As a subsidiary of the WPP Group we also comply with WPP conduct guidelines, which underpin our behaviour.

Within the SYZYGY GROUP, the Code of Conduct applies worldwide to management board members, executives, managers and employees, who commit to complying with it. We expect our business partners to adhere to the Code of Conduct as set out in the SYZYGY GROUP Code of Conduct Supplier.

The Code of Conduct outlines the behaviour requirements and understanding of values within the SYZYGY GROUP.

## 1. Governance

### Compliance with laws and guidelines

The SYZYGY AG and its subsidiaries operate throughout the world and respect national laws and regulations, as well as all other laws with an international reach.

The SYZYGY GROUP pledges to comply with the UN's Universal Declaration of Human Rights, the National Action Plan for Business and Human Rights of the Federal Republic of Germany, the International Labour Organization's (ILO) international labour standards for the protection of workers, the European Convention on Human Rights and the Modern Slavery Act. It does not tolerate any form of modern slavery, forced labour or child labour in the company or by suppliers. The rights of minorities and indigenous peoples are respected.

All measures relating to land, forest and water rights as well as forced evictions must respect and protect the human rights and dignity of all affected persons.

The SYZYGY GROUP complies with all applicable import and export control laws, economic sanctions and embargoes that impose restrictions on the exportation or re-exportation of goods, software, services and technology to certain destination countries and prohibit transactions involving certain countries, regions, organisations and individuals.

# SYZYG / GROUP

## **Fair competition and antitrust law**

The SYZYG GROUP observes the rules of fair competition for the benefit of all market participants in all business relationships. The SYZYG GROUP is committed to ensuring and upholding fair and undistorted competition. This is a core principle of existing international antitrust legislation and is therefore obligatory for the SYZYG GROUP. To protect the company itself and its subsidiaries against the consequences of a violation of legal provisions, all conduct that violates antitrust law is prohibited.

## **Combating corruption**

The SYZYG GROUP operates a zero tolerance policy towards bribery and corruption, and undertakes to ensure that all business transactions are legal and ethical. In addition to German legislation on combating international bribery, it complies with the UK Bribery Act and the US Foreign Corrupt Practices Act.

Within the SYZYG GROUP, the following principles apply with the aim of preventing conflicts of interest:

- Employees of the SYZYG GROUP undertake not to engage, directly or indirectly, for personal or family reasons in any activities that compete with the companies in the Group or enter into obligations with them.
- No bribes will be offered or paid to third parties, or accepted from them. This includes government officials, clients and intermediaries.
- A shared objective is to ensure the understanding of this Code of Conduct by means of training, communication and the exemplary behaviour of all employees.
- No personal incentives will be offered to secure business. Reasonable hospitality or occasional gifts of minor value are permitted unless the client has a policy that restricts this.
- Personal or family conflicts of interest within the group, or with business partners or other third parties with whom contracts exist, must be reported to management immediately so that appropriate measures can be taken.
- The SYZYG GROUP does not make any financial donations to parties or elected representatives and does not grant any pecuniary benefits beyond what is permitted by law. Rules regarding gifts and hospitality from and for third parties are set out in a Group-wide guideline.

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## **Prevention of money laundering**

The SYZYGY GROUP takes all necessary measures to prevent money laundering within its sphere of influence.

## **Inside information**

The SYZYGY GROUP treats as confidential all information that relates to the business of the SYZYGY GROUP and of our clients, and that which affects investors' trust in the integrity of the capital market. In particular, insider trading is explicitly prohibited. Confidential information must not be used for personal gain.

## **Whistleblowing procedure**

The SYZYGY GROUP maintains a culture of integrity and transparency. Employees, suppliers and stakeholders should be confident that they can express their concerns anonymously and without being worried about the consequences. The SYZYGY GROUP provides a free, confidential helpline so that whistleblowers can raise concerns without fear of retaliation. It can be used to report improper actions, incidents and problems relating to the company's activities. Further information about the helpline is available on the SYZYGY GROUP's website under Right to Speak (<https://www.syzygy-group.net/right-to-speak/>).

## **2. Social responsibility**

Compliance with human rights has high priority for WPP and the SYZYGY GROUP. The following areas are of particular importance.

### **Employees and working environment**

Employees are at the heart of the SYZYGY GROUP's business activities and are crucial to its business success. The Group strives to build a workforce that respects social values and creates an inclusive culture where people feel like they belong.

The working environment promotes participation, fairness and diversity. Support for flexible and participatory work models, occupational safety and health is a significant part of responsible corporate governance.

# SYZYGY GROUP

The SYZYGY GROUP provides a safe and healthy working environment for employees. By establishing and applying appropriate work systems, the necessary preventive measures are taken against accidents and injuries to health which may occur in connection with work. Employees regularly receive information and training on applicable health and safety standards and safety measures, as specified in our occupational health and safety guidance and introduction to first aid.

The SYZYGY GROUP complies with applicable national working time laws. It offers employees remuneration consisting of salaries and social benefits in accordance with applicable national laws. Workstations are set up in compliance with guidance on ergonomics in the workplace.

The SYZYGY GROUP is committed to promoting diversity and individuality. The uniqueness and variety of all employees is particularly valuable. This is essential to ensure everyone is able to develop their talents, thus generating a wide range of new ideas and leading to sustained success. In line with the UN's Universal Declaration of Human Rights and the ILO's international labour standards for the protection of workers, we treat all employees the same, regardless of gender, nationality, ethnic origin, religion, age and sexual identity.

When filling vacancies, we are also obliged to consider the interests of the company. The principle of ethical recruitment is very important to the SYZYGY GROUP. When recruiting, we look at qualifications and personal aptitude for the specific role. Great importance is attached to equal opportunities, equality, inclusion and diversity when selecting and developing employees. Discrimination in the workplace is not tolerated. The Group ensures that employees have freedom of association, collective bargaining autonomy and the right to collective agreements. Flexible work models are also promoted with the aim of achieving a constructive and inclusive working environment.

In accordance with the UN's Universal Declaration of Human Rights, forced labour and child labour are not tolerated. Young people are specially protected in compliance with youth protection legislation.

The SYZYGY GROUP does not tolerate the use, possession or supplying of drugs. Employees are forbidden to be under the influence of drugs or alcohol at work.

## **Suppliers**

The SYZYGY GROUP expects its suppliers to respect the human rights of their employees and business partners and to adhere to the principles of the SYZYGY GROUP's Code of Conduct in their company and their supply chain.

# SYZYG / GROUP

Suppliers that utilise private or public security forces for protection are required to implement adequate controls to prevent cruel, inhuman or degrading treatment of human beings.

All relevant suppliers are asked to sign the Code of Conduct Suppliers.

## **Client relationships**

Given the power of creativity to change attitudes and behaviours, the SYZYG GROUP is committed to applying high ethical standards to its work.

The SYZYG GROUP companies will not engage in any work that violates human rights. Orders containing statements, representations or images that violate common decency will not be fulfilled. The SYZYG GROUP takes into account the interests of minorities in the population appropriately, irrespective of race, religion, national origin, skin colour, sex, sexual orientation, gender identity, age or disability.

It does not undertake work that is intended or designed to mislead in any way, including with regard to social, environmental and human rights issues.

## **3. Data security and data protection**

The SYZYG GROUP is aware of the highly sensitive nature of the personal data entrusted to it by clients, business partners, employees, job applicants and shareholders. Careful and responsible handling ensures the security of this data. The SYZYG GROUP strictly adheres to the General Data Protection Regulation (GDPR). The privacy policy is available on the SYZYG GROUP website (<https://www.syzyg-group.net/en/data-protection-statement/>).

## **4. Integrity and corporate ethics**

### **Financial responsibility and disclosure of information**

The SYZYG GROUP has a duty of accountability to its employees, clients, business partners, the wider public and regulatory authorities. It is aware of its responsibility to maintain complete, correct and truthful business documents and records, including financial reports, quality reports, time records and expense claims. These are prepared in a timely manner in accordance with applicable laws and generally accepted accounting principles.

# SYZYGY GROUP

All business documents and records contain all relevant data and other documents necessary for financial and non-financial reporting in accordance with applicable regulations and for meeting disclosure obligations.

## **Intellectual property and plagiarism**

The SYZYGY GROUP respects and recognises the intellectual property of third parties. This includes intellectual creations such as inventions and patterns as well as works protected by copyright such as image rights of third parties. Intellectual property is only used in cases where the appropriate usage rights have been obtained. In addition, plagiarised products are not circulated and are reported to the relevant authorities. The theft of intellectual property is strictly forbidden.

## **5. Environment and climate**

Protecting the environment and climate is of major importance for the SYZYGY GROUP. The SYZYGY GROUP is committed to complying with all applicable environmental regulations and adhering to internal environmental guidelines. The SYZYGY GROUP aims to boost resource and energy efficiency in its everyday work in order to minimise negative impacts on the environment. Its goal is to achieve climate neutrality by 2030. The SYZYGY GROUP takes a responsible approach towards procuring and using resources, such as energy and water.

More details can be found in the SYZYGY GROUP environmental policy.

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## **Additional information**

The SYZYGY GROUP is guided by the German Corporate Governance Code, which was formulated by a Government Commission and serves as guidance for good, responsible corporate governance.

Further information about the Code is available at: <https://www.syzygy-group.net/en/corporate-governance/>

Bad Homburg v.d.H., June 2024

The Management Board