



2023

# Constaff Policy Statement

Diligence along our supply chains

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Legal & Compliance

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## 1 Introduction

This policy statement reflects Constaff GmbH's values. It has the purpose of providing a set of rules and guidelines for our daily business, and it applies to all employees, including executives and management. We also see it as the foundation for cooperation with our suppliers, business partners, and customers.

For reasons of simplification and better readability, only the masculine form is used. Needless to say, all genders (m/f/non-binary) are addressed at equal measures

## 2 Core values and approach

We are aware of our social responsibility. Therefore, we use our common sense to make every decision with respect for law and order, and by adhering to ethical principles. We also play by the rules. Our attitude influences every aspect of our actions and affects our processes in many ways. We are guided by the 17 Sustainable Development Goals (SDGs) set by the United Nations (UN) as part of the 2030 Agenda.

### 2.1 Human rights

We are dedicated to inalienable human rights and to preventing or ending human rights abuses in all respects. This applies both in our own business operations and along our supply chains. In particular, we are committed to complying with the following international guidelines and conventions:

- ILO Conventions and Declarations on Labour and Social Standards
- UN Universal Declaration of Human Rights of 10 December 1948
- Ten basic principles of the UN Global Compact
- UN Principles on Business and Human Rights

### 2.2 Anti-discrimination

We actively oppose discrimination in all its forms, both internally and externally. The selection of our business partners and employees is based solely on objective criteria that objectively justify our decisions. We do not discriminate on the basis of characteristics such as gender, age, origin, social status, religious affiliation, sexual orientation, or disability.



## 2.3 In-house Diligence

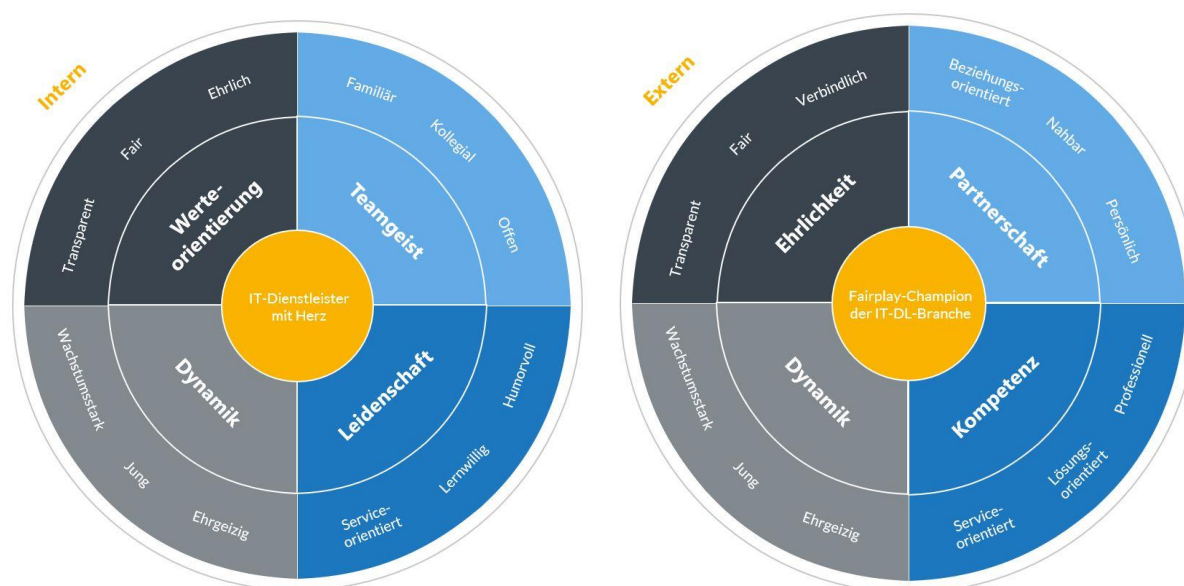
For our employees, we want to be a reliable partner that fosters the individual development of each person. We pay attention to transparency and appreciation among one another and would like to enable the participation of our employees. It is a matter of course for us to provide a working environment that supports healthy working and creates communication spaces. We provide a living wage and work against excessive labour.

We are also committed to the ILO's Fundamental Principles and Rights at Work of 1 June 1998 in accordance with national legislation. We do not permit forms of employment in which the employee is not free or is forced to work.

## 2.4 Prospects and Equal opportunities

The principle of sustainability also applies to personnel development. We want our colleagues and employees to feel comfortable with us and to enjoy their job. They should grow with us and have a long-term perspective at Constaff. To this end, we offer regular, appropriate further training and corresponding opportunities for promotion. Equal opportunities apply, no one should be discriminated against or disadvantaged on the basis of skin colour, religion, gender, sexual orientation or other unobjective reasons. Our employees and colleagues should be able to participate and help shape the company. We want to offer them a stable working environment and support the individual development of all employees.

How we understand and live our mission internally and externally is made clear by our value circles (German). We have developed these together with employees and business partners.



## **2.5 Value orientation**

We live honesty, fairness and transparency, both with our business partners, and also in our daily interactions. This is expressed, for example, in our open feedback culture, fault-tolerant learning culture, open door policy and the regular quarterly presentations on the state of the company, but also on future plans. In addition, the progress in achieving our corporate goals is visible to all employees at all times.

## **2.6 Respect for the environment**

As a fundamental asset, the environment is always in the focus of our entrepreneurial decisions. We would like to exclude environmental risks and make our own positive contribution to ecological sustainability. We also take this into account when selecting our suppliers. In our day-to-day business, we are committed to the responsible use of resources, which is expressed in guidelines, work instructions and declarations of commitment. As a service company, we have the opportunity to influence natural resources, especially in the area of purchasing. To protect them, we follow our procurement guidelines and select potential vendors on the basis of these.

## **2.7 Integrity**

We are not guided in our actions by unfair incentives and do not use such incentives to generate a benefit for ourselves. The guiding principle of our actions is to work the way an honourable businessman would. In accordance with our open book philosophy, we always calculate transparently and comprehensibly for all parties. Agreements that go beyond this do not exist and are avoided through the design of our work processes and checking loops.

## **2.8 Confidentiality**

As a company whose business operations cannot do without processing data, we are committed to the best possible protection of this data. Data is an asset of key importance to us, which is why we only deal with data responsibly and for the intended purpose. We maintain confidentiality regarding business secrets that become known to us in the course of our cooperation with customers and business partners.

### 3 Our risks

In light of our activities as a personnel service provider in the IT sector and in the IT-related environment, we have numerous contractual relationships with our customers, employees, service providers, and business partners. These diverse constellations harbour risks. They are often based on labour law issues, for the evaluation of which we depend on the trusting cooperation of all parties involved. A particular challenge is the avoidance of constellations that could be regarded as pseudo-self-employment. Furthermore, when selecting potential skilled workers for our clients, we have to exercise increased due diligence with regard to issues such as residence and work permits, sanctions and police clearance.

In our data-driven processes, failures and attacks on our IT infrastructure are a risk which, in the worst case, can threaten our existence. Therefore, we pay particular attention to the protection of these sensitive areas and to data privacy itself.

As an employer of currently already more than 240 employees, we see ourselves as responsible for the well-being of our workforce. Within this context, we are subject to obligations arising from labour law, occupational health and safety law, as well as social law and other legal matters. Here, ensuring compliance with the aforementioned is at the centre of our actions.

As a personnel service provider with a permit to hire out workers, we also have the responsibility to look after our workers' welfare in the hirer's company.

### 4 Prevention measures

To the greatest extent possible, we would like to ensure that human rights-related or environmental violations do not occur in the first place. We have established a number of measures to achieve this goal.

#### 4.1 Compliance Management

Our in-house compliance management system lists and weighs the relevant risks for our company and for our business partners that could arise in the context of our contractual relationships. We have a Compliance Officer on our side who is responsible for this. In cooperation with his team and our in-house legal department, he identifies risks, plans preventive measures, accompanies their implementation and deals with any need for improvement.

In addition to the aforementioned, Constaff has taken further preventive measures:

- No toleration of discrimination and other misconduct, consistent prosecution and, if necessary, enforcement by means of labour law.
- Compliance with labour law and legal requirements for employee protection, thanks to binding processes

- Sensitisation of employees in dealing with disadvantaged applicants
- Four-eyes principle for risk-generated decisions
- Whistleblower system for anonymous reporting of suspected compliance violations
- Standardised sanctions list checks for internal employees and potential advisors to minimise risks in accordance with EU regulations<sup>1</sup>
- Compliance with the applicable minimum wage laws and the collective agreement (as an iGZ member), mostly remuneration far above minimum wage
- Verification process to avoid bogus self-employment
- Granting of leave days above the statutory minimum
- Data privacy, General Act on Equal Treatment (AGG), compliance, IT security and anti-corruption trainings for employees as part of the onboarding programme as well as annual refresher trainings
- Provision of information for staff on assignments and travel abroad
- Establishing new collaborations, based on and in compliance with our values of equal standards of care on both sides

## **4.2 In-house Diligence**

- No employment of persons who are not of the legal minimum age
- No involuntary employment, slavery, forced labour or child labour
- Cooperation with service providers preferably from the German or European economic area or with similarly high CSR standards
- Appointment of trained first aiders and fire safety officers
- Appointment of a safety officer for health and safety at work
- Implementation of an office concept to ensure occupational safety
- Company doctor and company pension scheme
- Recording of working time
- Arbeitszeiterfassung

### 4.3 Sustainability concept and social responsibility

- Guidelines and instructions on the use of resources, waste and paperless office, to the greatest extent possible
- Selection of suppliers under sustainability aspects and to the greatest possible extent from countries with a low-risk indication
- Preference for local partners
- Purchasing according to our procurement guidelines
- Company headquarters in Germany's largest passive house development in Heidelberg
- Support for environmental and social projects through donations, e.g., the Sterntaler Hospiz and Waldpiraten Camp
- Fostering of environmentally-friendly options for commuting to work (job bike, company car with electric drive, charging points in the company underground car park)
- Guidelines on environmentally-friendly mobility for business trips
- Hosting of company IT in climate-neutral data centres in Germany

## 5 What does this mean for our partners?

A commitment is only worth as much as the extent to which those who are supposed to implement it, actually do. Therefore, we rely on the support of all stakeholders along our supply chains and in our own business. We also use suitable contractual agreements and guidelines for implementation. Our expectations are derived from the above and also have an impact on our partners.

### 5.1 Supplier Code

We measure our suppliers and their subcontractors by using the same principles and obligations as set out in this declaration. We also expect them to comply with the legal regulations and conventions applicable to them and to avoid or immediately remedy violations of human rights-related or environmental obligations. We encourage them to contribute to social cooperation and to anchor the protection of natural resources as a value in their business processes.

If we become aware of possible human rights violations or violations of environmental obligations, Constaff will take action on an ad hoc basis and elaborate a concept with the partner concerned to remedy the violations as fully and definitively as possible in a timely manner. If a termination cannot be expected within a reasonable timeframe, or if the violations are repeated or gross, we are forced to evaluate the cooperation and, in the worst case, terminate it.



Depending on the ongoing risk analysis, it may be necessary to amend this policy statement. If such an adjustment results in a substantial change in content, the business partners will be informed of this one month before the changes enter into force. Further details can be found in the notification of the change.

## 5.2 Employee Code of Conduct

As our most valuable asset and our first line of defence against compliance violations, our employees are the focus of our efforts. We expect all of them to comply with applicable law, to openly communicate violations to the responsible parties and to follow the guidelines and work instructions in business operations. In addition, internal expectations are laid down in the Code of Conduct, the meaning and duties of which are subject to mandatory annual training. This training focuses on points of contact in the areas of labour and data privacy law, anti-corruption, prevention of money laundering and occupational safety. Furthermore, we would like to encourage our employees to deal openly with mistakes - whether small or large - and to share the necessary information with the responsible persons. In line with our fault-tolerant learning culture, our response plan does not focus on sanctions but on personal and professional development.

## 6 Precedence of versions

If there are inconsistencies between several versions of this policy, the most recent version in the German language shall prevail.

## 7 Contact

### 7.1 Compliance Officer

Constaff GmbH, Langer Anger 3-5, D - 69115 Heidelberg  
Tel.: +49 6221 33896-188, e-mail: [compliance@constaff.com](mailto:compliance@constaff.com)

### 7.2 Compliance Team

Constaff GmbH, Langer Anger 3-5, D - 69115 Heidelberg  
Tel.: +49 6221 33896-188, e-mail: [compliance@constaff.com](mailto:compliance@constaff.com)

### 7.3 Whistleblower system

Link (external) to the digital whistleblowing system:

<https://whistleblowersoftware.com/secure/constaff-gmbh-compliance>