



Dear colleague,

We have committed ourselves to conduct our business to a high ethical standard. Our Code of Conduct clarifies what is expected from each of us on an individual level to keep up with our promise in our daily work. It is meant to encourage you to make the right choices as you perform your duties both in ordinary work situations and in cases where there are challenges to your personal or professional integrity.

The trust we build in our customer relations is based on our sincerity and integrity. We shall never compromise on these fundamentals.

If you feel pressure to act in a way that might compromise our fundamentals and this Code of Conduct, talk with us. We give you all the support you need to keep up to our promise. Together.

Yours,

Christoph Oliver Kiese

Sebastian Peter Fischer

Founder and CEO of Bluester GmbH

In June [2018].



This Code of Conduct is a guideline. It outlines high-level principles of what we @ [bluester] consider as ethical, responsible and sustainable conduct. By adhering to this conduct all of us make a positive contribution towards our mission and vision as a company.

As a company we are committed to adhering to the principles of human rights, labour standards, environmental protection and anti-corruption in our business strategy, day-to-day operations, organisational culture and sphere of influence.

SCOPE AND RESPONSIBILITY

This Code of Conduct applies to everyone involved in the business of [bluester]: to all employees and temporary employees, hired contractors or anyone rightfully acting on our behalf. Everyone must conduct her or his tasks and responsibilities for [bluester] in accordance with the requirements and principles set out herein. **Never act or encourage others to act contrary to this Code of Conduct.** Any non-compliance may lead to internal disciplinary actions, dismissal, or even criminal prosecution.

The principles of this Code of Conduct are also applicable to intermediaries and partners. The scope of services they provide should always be clearly stated, payment mechanisms should be transparent, and the size of the payment should be proportional to the level of services provided.

Report possible violations of this Code of Conduct. Any concern expressed in good faith relating to a possible violation will not result in retaliation of any form.

COMPLIANCE WITH LAWS, RULES AND REGULATIONS

We must at all times **observe and adhere to the laws** our operations are brought out under. We provide guidance on relevant laws and regulations to everyone involved in our business. At the same time we rely on your own knowledge building in this sphere and are committed to provide any support you may ask for in this respect.

We must be aware that even minor breaches of law during business activities can result in severe damage to business partners, customers and our company. Therefore you need to **prevent any breaches of law by applying utmost care.**

CONDUCT OF BUSINESS

[bluester] must **avoid conflicts of interest** and any combination of roles and services that could be perceived as a threat to **maintain the impartial and independent nature of our business and services** offered. Therefore **do not participate, to not take any financial or**



other interest in or appear to be related either directly or indirectly with any kind of business or activity that competes with or is detrimental to the interests, impartiality and integrity of our company and yourself.

Maintain your independent judgment on a personal level. You can rely on our support at anytime in any form to never surrender to pressure and/or inducements.

[bluester] services stand for true, fair and open competition. In our own business conduct we need you to **support us competing fairly in full compliance with all applicable antitrust and competition laws.**

We do not undertake any activity which unduly obstruct free and open competition, influence prices, or allocate business areas, geographies or clients. **Never enter into any agreement with competitors or other non-related parties that endanger the independent setting of our commercial policy and pricing.**

[bluester] does not accept corruption and trading in influence in any form.

Corruption or bribery is the abuse of a position of trust to acquire personal or business benefits for [bluester], yourself or others without being legally entitled to these benefits. Trading in influence is exerted when an improper benefit is provided to someone in order to indirectly influence the performance of the duties of a third party (for instance a relative, an acquaintance or others with access to a potential business partner or decision maker). This applies both to the party giving or offering an improper benefit, and to the party who requests, receives or accepts such advantage. For the matter to be considered illegal, it is sufficient that a demand or an offer of improper benefit is made.

Abstain from any behaviour which might cause the suspicion of corruption, bribery or trading in influence. This applies in particular to the use of irregular ways of payment.

Immediate family members are not employed @ [bluester] in, or remain in, positions, where a possible conflict of interest may occur. Decisions related to employment of immediate family will be taken without the concerned.

Do not accept or give presents or bonuses which have the effect of or even the appearance of impacting or impairing your, our, our business partner's or our client's ability to reach independent decisions.

Promotional or modest gifts for special occasions, or advertising gifts, as well as invitations that involve a business purpose are excepted. Giving or accepting monetary gifts is prohibited under any circumstances.



You may accept other gifts in situations where it would clearly give offense to refuse, in which case the gift will be regarded as company property.

We are committed to transparency. **Maintain accurate and complete data, records and reporting in accordance with applicable standards and laws.**

Confidentiality is a precious asset. **Make sure to comply with applicable non disclosure clauses and agreements and to respect copyright laws. Equally take utmost care in protecting data and our and our business partner's and customer's IT systems. Do not use corporate property, information or your position for personal gain.**

@ [bluester] we value intellectual property. **Respect any other's intellectual property** as well as trademarks, logos, trade secrets and other intellectual property protected by applicable copyright, trademark and other proprietary rights laws.

@ [bluester] we treat all employees fairly and with respect. **Treat each other with dignity and respect. Never discriminate or harass anyone in any form because of gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age or political opinion.**

In order to protect and persevere the environment for future generations we build work infrastructures that help to minimise emissions and consumption of energy and natural resources. **Contribute to safe the environment for our children.**