



**The Datamars Way**

**DATAMARS**

**Our code  
of conduct**

## Our code of conduct is built upon our values and principles.

## It forms the foundation upon which we all act, make decisions and conduct our business.

Our purpose as a company is to make a measurable difference. Our vision is to be world leaders in harnessing the power of data to measurably improve productivity and quality of life.

Datamars' life-changing brands and products put powerful data in the hands of our customers so they can make better informed decisions, get the right results and achieve measurable success – today and tomorrow.

Our success on this journey is not only dependent on pursuing the right strategy in the right way but also on the trust, dedication and integrity of all employees.

It is this combination that helps form the Datamars difference.

The Datamars difference is a synonym of the strong set of values and principles which make up the DNA of the company.

### Our principles for success

Our six principles capture the key elements that have guided our success to date, and those that will help us achieve success into the future.

- **Stay close to and responsive to our customers**
- **Believe in and support our people**
- **Leverage core strengths in technology and deliver full, 'integrable' solutions**
- **Build quality products and trusted brands**
- **Enable manufacturing excellence**
- **Commit and contribute to a sustainable future**

## Our values

Our values express the way we work together and how we conduct ourselves. They are the guiderails for our behaviour by which we hold each other to account.

**Be passionate** – for solving genuine customer problems through our products and services as well as in working together as a team

**Aim to excel** – in what we produce as well as the way we work, by delivering measurable results and creating value through inspiration and reliability with the most innovative solutions

**Respect one another** – treating everyone inside and outside our organisation with respect, building relationships that create long-term value

**Strive for performance** – always working to strengthen our performance and reputation and to provide consistent returns for our shareholders

**Be empowered** – encouraging each other and providing the environment where we can take responsibility and initiative and give our very best, embracing errors so we can learn and progress toward our vision and goals.

This Code of Conduct covers our dealings with stakeholders, clients, counterparties, shareholders, business partners – and each other. It is also the basis for all our policies, guidelines and procedures.

This Code has the full backing of the Board of Directors and Group Management. It is our duty to read this Code completely, to do our best to understand it fully and to apply it, every day and always.

We aspire to be a world leading company in all respects and while it is difficult to detail every possible situation, we trust in our personal integrity and good judgement to do what is best at all times for our company and each other.

Thank you for making a measurable difference!



Klaus Ackerstaff  
Executive Chairman of the Board of  
Directors



Daniele Della Libera  
Chief Executive Officer

## We all comply with laws, rules and regulations

### Values and Behaviours

We act with integrity and independence by holding ourselves and each other to be ethical and reliable in all we do, by following rules and regulations where we live, work and do business – as well as our own Datamars policies, guidelines and procedures.

### Cross-border business

As a global organization, we are subject to numerous laws, rules and regulations – both at home and abroad.

If we are selling to, buying from, visiting or dealing with clients from outside our home country, it is our job to understand what rules, laws or policies apply – to be always compliant with trade control laws which impose licensing requirements and other restrictions.

### Antitrust and Competition laws

Datamars is prepared to compete successfully while respecting the laws, rules and regulations in today's business environment.

We succeed by outperforming our competitors fairly and honestly, not by resorting to unfair or underhand tactics.

We act in good faith towards everyone we deal with: our clients, business partners, competitors, suppliers, the public and each other.

In this context, we will set commercial policies and prices independently and we will never agree them, formally or informally, with competitors or other non-related parties, whether directly or indirectly.

### Integrity of our own business

We have zero tolerance for corruption or any kind of bribery, including so-called facilitation payments, given the fact that they do not only entail disciplinary sanctions but also result in criminal charges.

We don't offer or accept, directly or through intermediaries, improper gifts or payments during our business.

We refrain from any activity or behaviour that could give rise to the appearance or suspicion of such conduct or the attempt thereon.

All of us are responsible for reading and abiding to this code as any supplemental Datamars policies and guidelines.

Employees engaging third parties acting on behalf of Datamars, should also ensure that the third parties are aware of their obligations under this code.

We will not help our clients or suppliers to operate outside the limits set by the laws (of tax and commercial nature, as well as of any other kind).

## We all behave responsibly and ethically

### Our relationships with customers

We act ethically and with transparency. We look after our clients for the long term, gaining their loyalty by earning their trust.

We try to anticipate what our clients are going to need, before they ask. We go out of our way to give them exceptional goods, services and experiences with us. And we treat them fairly, and with the same courtesy and respect, however large or small they may be.

### Conflicts of interest

A conflict of interest occurs when personal interests of an employee or the interests of a third party compete with the interests of Datamars.

We put our clients' best interests before our own and Datamars interests before our personal interests. And we never let Datamars or our personal interests influence the relationship to a client or vendor, or our dealings with them. As soon as we do spot any conflicts of interests, we raise them with our line manager or Group Compliance Officer immediately, to resolve the situation in a fair and transparent manner.

### Families and relatives

We may hire, as employees or consultants, immediate family members and partners only if the appointment is based on qualifications, performance, skills and experience and provided that there is not direct or indirect reporting relationship.

These principles of fair employment also apply to all aspects of employment, such as compensation, promotions and transfers, as well as in case that the relationship develops after the respective employee has joined the company.

### Integrating financial and societal performance

We integrate financial and societal performance for the mutual benefit of our clients and our organisation. We're constantly looking for better ways to do business which are environmentally sound and socially responsible.

That includes monitoring, managing and reducing any negative impact we might have on the environment and on human rights. It means managing social and environmental risks that our own assets are exposed to.

### Outside engagements and activities

We shall not pursue any activities outside of Datamars if they will interfere with our responsibilities for Datamars, or if they create risks for Datamars' reputation or if they in any other way conflict with the interests of Datamars.

When in doubt about the permissibility of an activity, we consult with the Group Compliance Officer.

## We all take care of information

### Reporting and information sharing

When we share or report anything, especially financial information, we take great care to make sure it is accurate, up-to-date and as easy to understand as possible (and in line with any legal or regulatory requirements, and best practice).

We maintain an internal control framework that is designed to support the preparation and fair representation of consolidated financial statements in accordance with the group accounting principles and that are free from material misstatement.

### Confidential information

Confidential information consists of any information that is not or not yet public information. It includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, product recipes, designs, plans, databases, records, salary information and any non-published financial or other data.

Our success depends on the use of confidential information and its non-disclosure to third parties.

We value and protect our confidential information and we respect the confidential information of others.

We never share our clients' or suppliers' details with anyone, nor the personal data of our employees, unless we have their express permission to do so.

### Third parties' confidentiality

We respect that third parties have a similar interest in protecting their confidential information.

In case that third parties, such as joint venture partners, suppliers or costumers, share with Datamars confidential information, we treat such information with the same care as if it was our confidential information.

In that same spirit, we protect confidential information that we have obtained during our prior employment.

## We are all committed to creating the proper culture

### Embracing diversity and equality

We know that our business is only as strong as our people. So we work hard to create a working environment where talent can thrive and reach its full potential. And we work to create a culture where everyone feels welcome, respected and that they are a valuable part of our team – whatever their race / ethnicity, gender, national origin, age, ability, sexual orientation or religion.

We believe that people from different backgrounds, with different thoughts and opinions, make us a stronger business and a stronger team. They bring us valuable new ideas, approaches and experiences and support our continuous improvement.

We do not tolerate any kind of discrimination, bullying or harassment and we encourage each other to speak up and report it through clear channels, without fear of reprisals.

### Protecting our assets

We never engage in fraudulent or any other dishonest conduct involving the property or assets or the financial reporting and accounting of Datamars or any third party. This may not only entail disciplinary sanctions but also result in criminal charges.

We safeguard and make only proper and efficient use of Datamars property. We all seek to protect Datamars property from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including trademarks and patents, intellectual property in general, know-how, confidential or proprietary information and information systems.

To the extent permitted under applicable law, Datamars reserves the right to monitor and inspect how its assets are used by employees (including inspection of all e-mails, data and files kept on Company network terminals).

We retain data to fulfil regulatory retention and legal hold obligations.

We will not use such assets for non-Datamars business or for our own personal advantage.

### Safety

We never do anything that might put people in danger or harm them in any way – whether they're colleagues, clients, partners, competitors, visitors or anyone else.

We keep our workplace safe by following health and safety rules and looking out for each other. Doing this makes sure we have safe and healthy working conditions that respect our dignity and enable us to return home safe and well at the end of each day.

## We all uphold our Code

From our Board of Directors through to all our employees, we live up to this Code always, with no exceptions.

If at any stage we have concerns or queries, we seek help from our line manager or from a member of our Group management team. Or we refer to the Group Compliance Officer at [GroupComplianceOfficer@datamars.com](mailto:GroupComplianceOfficer@datamars.com).

### Violating the Code

Datamars will not accept any justification or excuse for breaking this code, whatever the reason – whether for profit, convenience, competitive advantage or because a business partner or someone else asked for it.

### Disciplinary procedures

Anyone who breaks the rules (whether it is our Code, Datamars policies or outside laws, rules and regulations) will face serious consequences – from reprimands and warnings to demotions or dismissal.

That includes not only the person who broke the rules, but also their line manager and anyone who knew about it but did not report it.

And where someone has broken the law, we will not hesitate to report them to the relevant authorities.

### Whistleblowing

If we become aware of anything that we believe may violate a law, regulation, this Code or any other Datamars policy, we immediately report any potential violations to our line manager or Group Compliance Officer.

We can also report them, confidentially and in an anonymous way, using a formal web-based reporting system at <https://datamars.integrityplatform.org>.

Datamars will never punish or reprimand anyone who reports these kinds of breaches or violations in good faith. And Datamars expects its line managers to escalate and report any violations of laws, rules, regulations, policies, professional standards and the principles of the Code.

Thank you for observing the code and for supporting us in detecting any critical situation in due time. For further detail, please refer to the Datamars Whistleblowing policy.