

AEB Compliance

# Code of Conduct

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AEB

# Code of Conduct

## Introduction

This Code of Conduct is a guide for all of the AEB Group and applies equally to everyone.

Our shared values of trust, openness, long-term thinking, authenticity, purpose, and personal responsibility are central to how we interact and collaborate. They are firmly anchored in our corporate culture and documented in writing in our [Common Ground](#).

We hold ourselves as a company, our employees, and our business partners to the same standard of legal compliance and adherence to the principles of environmental, social, and ethical conduct.

## Legal compliance

The Code of Conduct of the AEB Group is based on compliance with all relevant national and international laws and regulations. This includes international conventions such as the United Nations Universal Declaration of Human Rights, the Children's Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, international labor standards, and the terms of the UN Global Compact.

AEB makes business decisions in compliance with applicable law and takes all necessary measures to ensure that our actions are lawful. We expect the same from our suppliers, customers, and partners. Any violation can be grounds for AEB to sever the business relationship and all supply contracts.

## Human rights

We categorically reject any kind of child labor or forced labor, without exception. We respect and promote global regulations to protect human rights and the rights of children as fundamental and universal. We reject all forms of modern slavery and human trafficking and ensure that we are not complicit in human rights violations. We expect the same from our suppliers and partners.

## Equal opportunity and equal treatment

Our actions are guided by the universal values of justice, tolerance, respect, and autonomy. What this means: We offer everyone the same opportunity and do not disadvantage anyone. We respect other opinions, perspectives, and attitudes besides our own.

We do not tolerate any form of discrimination, including discrimination based on gender, nationality, disability, ideology, race, ethnicity, religion, age, pregnancy and parenthood, or sexual orientation and identity. We respect the personal dignity, privacy, and personal rights of each individual.

## Sustainability

We practice responsible, sustainable management at AEB. We take our social responsibility around sustainability very seriously and continuously optimize our activities and software solutions for greater sustainability. In the interests of a holistic approach, it is important to us that our suppliers do their part.

We want to make our world greener and more equitable and are taking the initiative to promote greater environmental awareness. Our climate action plan is designed to help achieve the 1.5°C target of the Paris Climate Accords. We follow the logic of "avoid – reduce – offset" and see offsets as the last option, focusing our efforts on avoiding emissions in the first place.

## Due diligence along the supply chain

Not only are we diligent in selecting our suppliers, we are also deliberate about procuring sustainable products and solutions. Long-term relationships with our suppliers are important to us.

We naturally adhere to the principles of this Code of Conduct in selecting our partners and suppliers and make reasonable efforts to ensure that they do the same.

## Bribery, corruption, and conflicts of interest

We stand up against any form of corruption and take all necessary measures to prevent corruption in connection with the business activities of AEB. This means not only avoiding any violation of the law but also avoiding all actions that could give others the impression of corruption, even if no laws are violated. This includes any interactions with officials, elected representatives, governments, authorities, and other public institutions.

Decision-making processes can involve situations in which the interests of AEB conflict with personal interests, but our personal relationships and interests must not influence our professional judgment or business decisions. Employees who face a potential or actual conflict of interest are obliged to inform the management immediately so that an appropriate solution can be found with transparency.

## Gifts and donations

We do not solicit or accept gifts or donations from customers for personal gain. Donations that influence or could influence how we perform our work for the company are also unacceptable. We have in-house policies on how to deal with gifts, entertainment, and event invitations. Gifts to business partners are also offered only within the boundaries of what is typical for the business relationship and within appropriate financial limits.

AEB does not donate to political parties, to individuals, or to organizations that are inconsistent with our corporate philosophy.

## Antitrust legislation

To protect and promote free and open competition, we comply with antitrust law in our interactions with competitors, suppliers, distributors, and retailers.

## Data protection and confidentiality

We comply with all provisions of the law relating to the protection of privacy and the handling of personal data. This means that a legal basis (such as consent or a contractual agreement) is required to collect, store, process, or otherwise use the personal data of data subjects. Data protection is part of the security culture that we encourage, support, and monitor through security campaigns and by maintaining an ISO 27001 information security management system.

Protecting company and business secrets is also a high priority for us. All employees sign our Data Processing Confidentiality Agreement as part of their employment contract.

## Security and use of IT systems

We are actively involved in protecting the company's hardware and software against internal and external misuse. We take appropriate security precautions (passwords, access protocols, licensed software) to protect our intellectual property and personal data. We follow the necessary security protocols to avoid data loss, the theft of personal data, and copyright infringement. For this reason, we also pay close attention to the content of electronic communications and the data shared in files we exchange. Employees do not use company hardware or software for illegal or inappropriate activities.

## AI at AEB

AEB uses artificial intelligence (AI) in various areas and tests it in controlled environments. We welcome the opportunities offered by AI, and encourage an intensive exploration of it. AEB offers AI training courses, workshops, and documentation.

The following principles and rules apply when dealing with AI: Confidential data may not be entered into an AI unless it has been approved by AEB. Results must be checked for confidential or copyrighted content before they are passed on or used. Everyone is made aware that AI does not always produce “truths” and therefore all results must be carefully checked. If AI results are used without modification, this must be clearly marked, except in the software development process, where this is currently not necessary.

## Responsibility for compliance

Our common goal is to take responsibility for our company. This means that we are aware of our environmental, social, and ethical conduct and wish to further promote and protect it. We invest in sustainable, long-term business relationships that rely on ethically appropriate behavior and legal compliance. Overall responsibility for compliance management lies with the Executive Board. It undertakes to make all necessary efforts to comply with the principles and values described in this Code of Conduct.

## Internal reporting office

We have set up a whistleblower system to report violations of the law, our Code of Conduct, or our compliance guidelines. Our legal ombudsman accepts tips confidentially.

We assure that each tip is carefully examined and that no one will be disadvantaged in any way for making a report.

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