

ALEXANDER THAMM GMBH

CODE OF CONDUCT
(COC)

[at]
alexanderthamm

Introduction



Dear colleagues,
dear business partners,

Technologies such as Artificial Intelligence will help humanity tackle its biggest challenges such as climate change, epidemics, and a fair global economy. In doing so, we believe in European values such as privacy and human-centered AI. Therefore, with our daily work, we help people and organizations to use data and AI responsibly and for the benefit of people. In order to live up to this claim and ensure our company's sustainable success, we have described in our values how we want to work together. Based on our musketeer principle - one for all, all for one - we can only achieve this goal together. In particular, our values of responsibility, openness and trust support us in this.

This Code of Conduct brings together for the first time our most important basic rules and values in a single document that is binding for us and provides both us and our sub-contractors with a framework for orientation. It sets a standard for us and is at the same time a promise to the outside world of responsible conduct towards business partners and the public, but also in our dealings with each other and within the company.

We therefore ask our employees and subcontractors to read this Code of Conduct carefully and to actively use it as a basis for their daily work.

Alexander Thamm
Founder and Chief Executive Officer
Alexander Thamm GmbH

Preamble

The employees of Alexander Thamm GmbH have developed common values that guide our daily work. These values express what we stand for as a company:



Curiosity

We are innovative and love to try out and test new things. We continuously challenge existing processes. We are not satisfied with simple answers but continue to investigate until we understand the interrelationships in depth and find the right answers.



Passion

We are enthusiastic about data and have fun and enjoy our work. Each one of us is convinced that we make an important contribution and has the opportunity to realize his or her own potential with us. This motivates us every day to anew. We also transfer our enthusiasm to our customers and partners.



Excellence

Our aspiration is to be the best at what we do and to always deliver the highest quality. We not only want to meet our customers' expectations, but to exceed them significantly. Each and every one of us has high standards for ourselves and will not settle for the first best solution.



Trust

An open and honest interaction with each other as well as mutual trust are the basis for a successful cooperation. With us, everyone stands up for the others. We also call this the "musketeeer principle".



Openness

We are unbiased and open to new things. We explore new paths with our customers and share our knowledge. In doing so, we are also willing to take risks, because this is the only way to create real innovations. We are open to advice and see criticism as a gift.



Responsibility

We act responsibly, reliably and sustainably towards our customers, employees and business partners. Each and every one of us is jointly responsible for the success of the company. We defend our convictions and bear the consequences for our actions.

RESPONSIBILITY

The responsibility for society expressed in our values also includes an active commitment to sustainable development, which we also support by signing the ten principles of the United Nation Global Compact. We are also committed to the United Nations Universal Declaration of Human Rights and the core labor standards of the International Labor Organization (ILO).

This Code of Conduct summarizes the principles and rules governing our actions and sets out our expectations of ourselves as well as our business partners and stakeholders.

It is not intended to replace laws and regulations. Rather, it is intended to promote and ensure compliance with them in a conscientious and effective manner.

In order to do justice to ourselves and our customers in terms of sustainability, this Code of Conduct applies both to our employees and to the subcontractors who work on our behalf of us for the customer and represent us as part of our ecosystem.

WE SUPPORT



Social Responsibility



Exclusion of forced and child labor

We strictly reject any form of forced labor, slave labor, child labor or work of a similar nature. All work is always performed voluntarily and employees have the choice to terminate the employment relationship at any time. In addition, unacceptable treatment of workers, such as psychological hardship, sexual or personal harassment, is strictly prohibited and will not be tolerated. Withholding personal property, passports, wages, training certificates, employment or other documents for unreasonable reasons is also not accepted. Furthermore, the standards drawn up by the International Labor Organization (ILO) are observed. The rights of employees requiring special protection (e.g. pregnant women, physically impaired, young or older employees) are to be protected and special protective regulations are to be observed.

Fair compensation

The right to adequate remuneration is recognized for all employees. The remuneration for regular working hours and overtime always corresponds to the respective applicable legal minimum wage

or the minimum standards customary in the industry, whichever is higher.

Employees are provided with all benefits required by law. Wage deductions as punitive measures are not tolerated.

In addition, we ensure that employees receive clear, detailed, and regular written information about the composition of their pay.

Fair working hours

Working hours consistently comply with applicable laws and/or industry standards. Weekly working hours shall not regularly exceed 48 hours. We ensure that individual employees' needs for rest are met through appropriate paid leave.

Freedom of association

We respect the right of employees to form and join organizations of their choice and to engage in collective bargaining. In cases where freedom of association and the right to collective bargaining are restricted by law, we provide alternative means of independent and free association of employees for the purpose of collective bargaining.

Prohibition of discrimination

An open culture of equal opportunity, characterized by mutual trust and respect, is of great importance to us. Discrimination against employees in any form is therefore inadmissible for us. This applies, for example, to discrimination based on gender, racial reasons, skin color, disability, political opinion, origin, religion, age, language, pregnancy, or sexual orientation. We respect the personal dignity, privacy, and personal rights of every individual. We treat all employees with respect and do not use corporal punishment, psychological or physical coercion or any form of mistreatment, harassment, or threats of such measures.

Health protection and workplace safety

The safety and health of our employees are particularly important to us. By setting up and applying appropriate occupational safety systems, we therefore ensure that necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the work. In addition, employees are regularly informed about applicable health and safety standards and measures; relevant documents are also available at all times. Employees are also provided with access to sufficient drinking water and clean sanitary facilities.

Each of our employees promotes health and safety in his or her work environment and undertakes to comply with occupational health and safety regulations.

Every supervisor is obligated to instruct and support his or her employees in the fulfillment of this responsibility.

The same safety standards apply to our subcontractors as to our employees.

Donations

We see ourselves as an active member of society and therefore get involved in various ways. We make donations and other forms of social commitment solely in the interests of the company. When making such donations, we observe the principle of altruistic action and clearly differentiate this from sponsoring.

Sharing knowledge

Sharing our knowledge with customers and society, using it effectively and consistently expanding it is something we ascribe special importance to. We enable our customers to develop their own strengths through our knowledge and accompany them on their way with our Data Journey - from data strategy to the development of algorithms and the construction of IT architectures to marketable data products and the long-term operation of platforms and applications. For our employees, this means contributing their own expertise, constantly developing it and sharing it with others. Together with our strong network, we ensure a continuous exchange of knowledge and experience.

Environmental responsibility

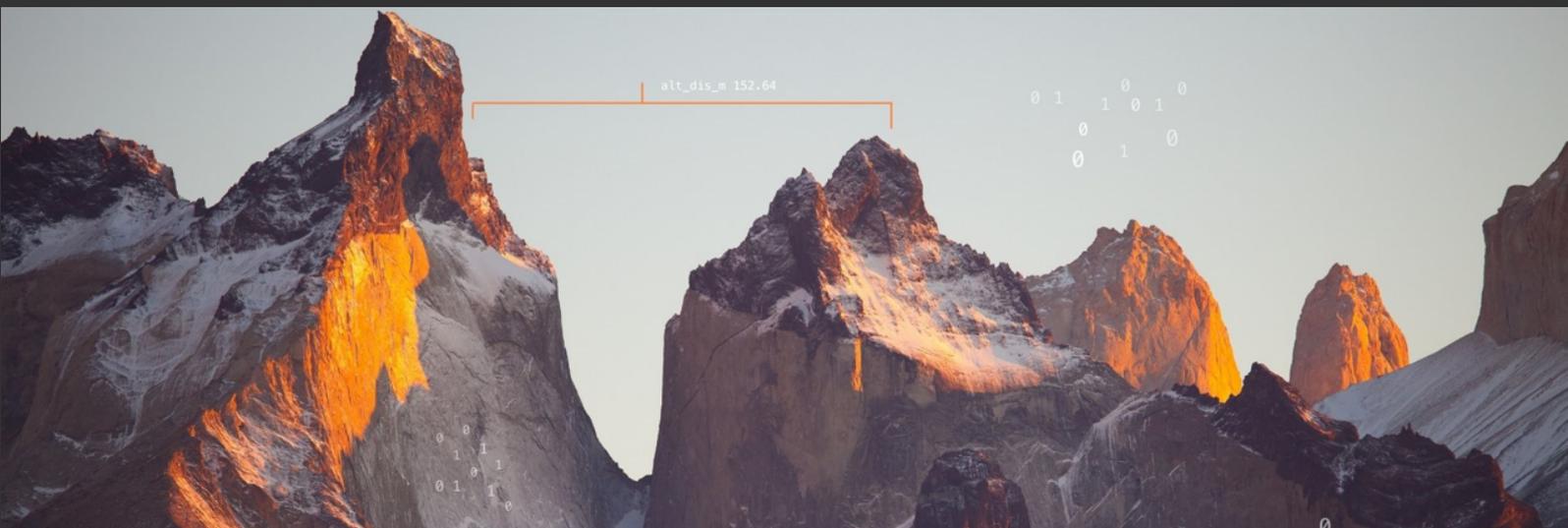


We take a prudent approach to environmental challenges, implementing initiatives to promote environmentally responsible behavior and encouraging the development and agreement of environmentally friendly technologies. Both we and our sub-service providers act in accordance with applicable locally and internationally recognized environmental standards, as well as in compliance with applicable local laws, always applying the highest standard.

Alexander Thamm GmbH and its sub-contractors are committed to minimizing

the environmental impact of business (e.g. business travel) and implementing measures to promote environmental protection.

Already in the planning and development of new products and services at our customers, we make sure that they are characterized by lower energy consumption and lower CO2 emissions throughout their entire life cycle. When developing products and technologies, we strive to reduce resource consumption and increase efficiency. In addition, each of us is responsible for reducing environmental impact through environmentally conscious actions in our daily work.



Ethical responsibility



Compliance with laws and regulations

For us, compliance with laws and regulations is an essential basic principle of economically responsible action. We observe the applicable legal prohibitions and obligations at all times, even if this entails short-term economic disadvantages or difficulties for the company or individuals. If national laws contain more restrictive regulations than those applicable at Alexander Thamm GmbH, national law shall take precedence.

Fair competition

The standards of fair business, fair advertising and fair competition are particularly important to us. We therefore commit ourselves to fair conduct towards customers, competitors, authorities and employees. We accept free competition and face the resulting tasks in a fair and open manner. We trust in the quality of our services and products and therefore strictly reject unfair and anti-competitive market manipulation.

Confidentiality/data protection

The protection of confidential and personal data, in particular of employees, customers, suppliers and business partners, is of major importance to Alexander Thamm GmbH. We therefore take the necessary steps to protect confidential information and business documents from access by unauthorized third parties.

We are committed to meeting the reasonable expectations of the client, suppliers, customers, consumers and employees regarding the protection of private information. We observe and comply with data protection and information security laws and government regulations when collecting, storing, processing, transmitting and disclosing personal information. No personal data will be collected or processed without legal authorization or the consent of the data subject.

Intellectual property

We respect intellectual property rights; technology and know-how transfers are made in a way that protects intellectual property rights and customer information. We use the company's property and resources properly and carefully and protect them from loss, theft or misuse. The intellectual property of our company represents a competitive advantage for Alexander Thamm GmbH and thus an asset worthy of protection that we defend against any unauthorized access by third parties.

Corruption and anti-money laundering

Corruption, money laundering and anti-trust violations not only threaten the success of the company, they also violate our ethical standards and are therefore not tolerated (zero tolerance). We therefore apply the highest standards of integrity in all business activities. Bribery, corruption, extortion and embezzlement are not means for us to exert influence on other persons or organizations in the public or private sector. This must also be considered when dealing with donations, gifts or invitations to business meals and events.

Violations will not be tolerated and will result in sanctions against the relevant persons or the relevant business partners.

Alexander Thamm GmbH complies with its legal obligations to prevent money laundering and does not participate in money laundering activities.

Every employee and business partner is requested to have these checked immediately by the finance or legal department, in particular including cash that could give rise to a suspicion of money laundering.

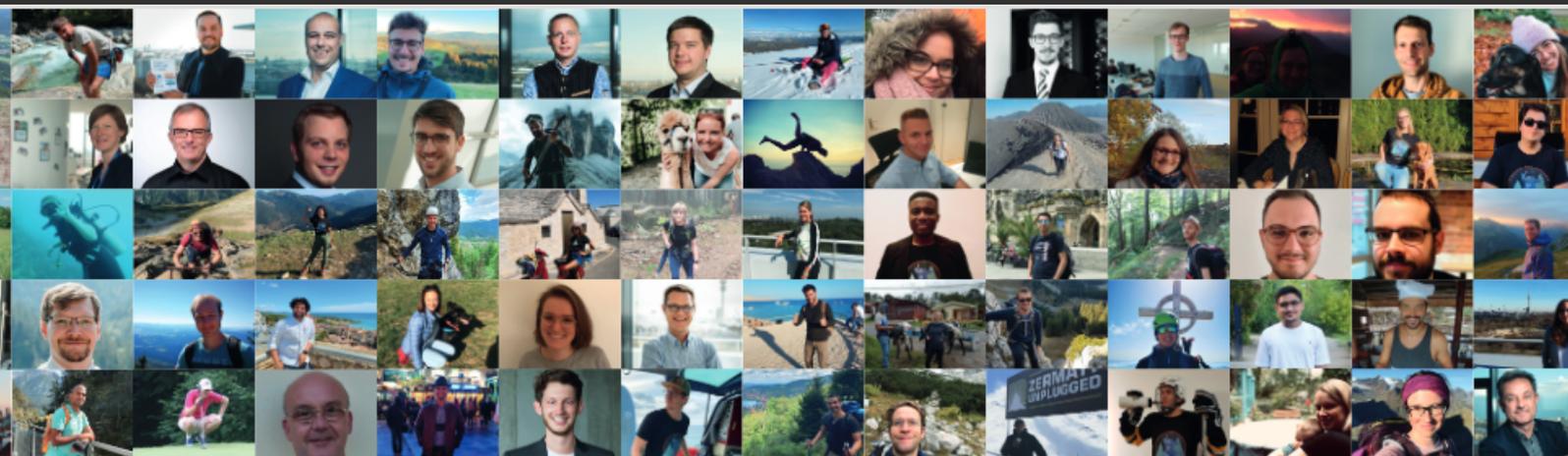


Implementation

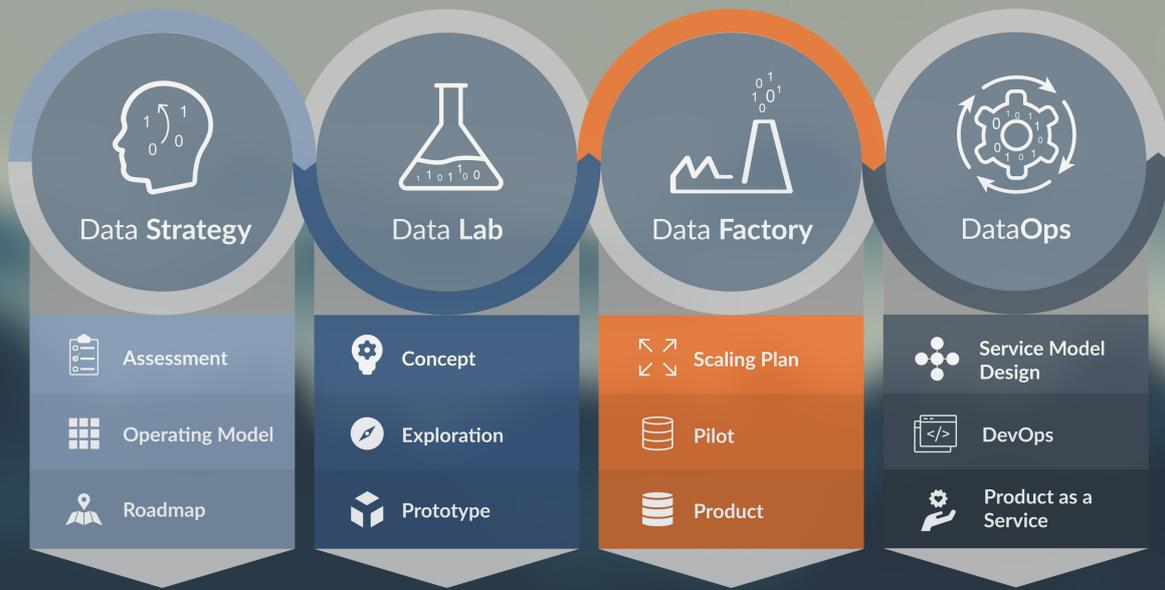
Alexander Thamm GmbH expects all its employees to comply with this Code of Conduct. Regardless of their position, all employees are personally responsible for their own compliance with the Code of Conduct. Our managers have a special role model function in this respect and are particularly measured against the Code of Conduct in their actions. They are the first point of contact for questions on understanding the regulations and ensure that all employees know and understand the Code of Conduct.

As part of their management duties, they prevent unacceptable behavior or take appropriate measures to prevent violations of the rules in their area of responsibility. Trusting and good cooperation between employees and supervisors is reflected in honest and transparent information and mutual support.

As this Code of Conduct applies equally to internal employees and our subcontractors, employees and subcontractors are regularly made aware of current matters relating to this Code of Conduct.



[at] Data Journey



We have used our experience from over 1.000 projects in the last 8 years to develop a holistic system for Data & AI projects – our [at] Data Journey. An integrated Data Strategy forms the basis and the framework for generating real added value from Data – what we have dubbed Data2Value. Our Data Lab is all about speed! Their main goal is to test Use Cases as quickly as possible – from the concept phase to the prototype using real Data. In the Data Factory, Use Cases are industrialized into finished products. The absolute main focus is on scaling and the sustainable generation of added value – as such, the user is just as much the focus here as well. In our DataOps we continuously operate and maintain your platforms and Machine Learning algorithms.

About [at]

Alexander Thamm GmbH is one of the leading providers of data science and artificial intelligence in the German-speaking area. We generate real added value for and with our customers from data so that they are also competitive in the future. To this end, we develop and implement data-driven innovations and business models. The service portfolio covers the entire data journey - from the data strategy to the development of algorithms and the construction of IT architectures to maintenance and operation.

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