



b.telligent

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# Compliance Policy Partner

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## b.telligent stands for fair and sustainable economy

b.telligent assumes responsibility – with this compliance policy, we want to give our business partners a guideline and put something evident from our point of view into words. Addressed here are the issues of human rights, labour standards, environmental protection and anti-corruption measures.

b.telligent is a member of UN Global Compact, the world's largest corporate sustainability initiative. The 10 principles of responsible dealings formulated by this initiative are integrated by b.telligent into the company's own compliance policy.

The compliance policy serves as a guide for orienting own conduct and is, naturally, only able to represent minimum, basic requirements. It reveals the main areas which, in our opinion, are of special significance in practice. Each business partner is themselves responsible for adherence to the following codes of conduct and implementation of internal compliance management to prevent unethical and punishable business practices. b.telligent decisively rejects illegal or ethically questionable conduct.

The enterprise-specific guidelines mentioned below and, of course, legal provisions must be observed **at all times by all b.telligent business partners.**



## 1. Our business principles

Vis-à-vis officials as well as persons from the private sector, specific codes of conduct must be observed to distinguish legitimate customer care from legally punishable corruption.

b.telligent commits itself without any restriction to competition **by fair means, transparency and, in particular, strict observance of antitrust laws** as well as other relevant legislation on competition. b.telligent also expects its business partners to commit themselves to fair competition.

### 1.1 No preferential treatment

Corruption can take place actively or passively, i.e. impermissible contributions can be requested/accepted or provided/offered. Neither b.telligent nor its business partners must make award or handling of orders dependent on benefits. This also applies to benefits provided to a family member or other third party. Furthermore, customers or officials must not be offered, promised or granted benefits in return for a preferential competitive status.

### 1.2 Distinction between socially appropriate customer care and corruption

A distinction between socially appropriate gifts and corruption can be difficult in some cases. Besides the value and social normalcy of the provided benefit, further circumstances can also prove decisive in individual cases. Contributions are socially appropriate and therefore constitute legitimate customer care if they are socially familiar in the context of courtesy and thoughtfulness, and generally endorsed with regard to protection of legal interests.

In business transactions, such contributions must remain within acceptable, quantifiable limits. The actual limit in each case is determined by the business practices which are typical and usual for the sector in which b.telligent operates as a management consultancy. A limit of 30 EUR seems appropriate here, and contributions normally ranging to this value are likely to be acceptable.

**Officials** are often subject to stricter internal restrictions. Contributions to officials must therefore be limited to a minimum (value **between approximately 5 and 10 EUR**). Special attention must be paid to this.

If the above-mentioned limits are exceeded or if there are concerns that a particular contribution might be problematic even within specified limits, written permission should be obtained from the relevant supervisor. The request must be made directly to the supervisory staff of the customer, business partner or administrative agency.

The following types of contribution **up to 30 EUR** are socially normal:

- a) **Moderate** catering with food and drinks, as is customary at meetings/business meals
- b) Provision of stationery or small gifts such as calendars, advent calendars, chocolate etc.

The following items would be unusual and therefore unacceptable:

- a) Gifts sent to the employee's home address
- b) Gifts/money spent on a life partner/spouse
- c) Cash
- d) Gifts > 30 EUR
- e) Invitations to events (concerts, sports events), trips etc.
- f) Opulent business meals

This rule applies to applies to offered as well as received contributions, if they are meant to promote customer care and other business relations (with service providers or business partners).

Some cases of corruption are very subtle, so that precise classification can by all means be difficult. All doubtful cases should therefore be reported to the management board or legal department of b.telligent for assessment.

Rules to be considered with regard to socially normal contributions (refer to limit of 30 EUR on P. 4):

- Contributions are to be distinguished clearly and unmistakably from open business transactions!
- Never request a contribution!
- Never give away or accept cash or cash-like donations!

### 1.3 Business partners' obligation to notify

In all cases of doubt, or if a business partner suspects a case of corruption, the management board or legal department of b.telligent must be informed.

Please note:  
**“Sweetening”**  
**of relations with**  
**officials** is routinely  
**penalized by law**  
 in Germany!



## 2. The ten principles of UN Global Compact for corporate sustainability



### Deutsches Netzwerk

**UN Global Compact:** b.telligent is a member of **the world's largest and most important initiative for responsible enterprise management**. On the basis of its 10 universal principles, UN Global Compact pursues the vision of a sustainable global economy for the benefit of all people, communities and markets, today and in future. We also want to realize this vision, and commit ourselves to the following principles of UN Global Compact:

#### 2.1 Human rights

**Principle 1:** Enterprises should support and respect the protection of internationally proclaimed human rights within their sphere of influence, and

**Principle 2:** make sure **not to be complicit in human rights abuses**.

#### 2.2 Labour standards

**Principle 3:** Enterprises should uphold **freedom of association** and effective recognition of the right to collective bargaining, as well as

**Principle 4: elimination of all forms of forced labour,**

**Principle 5: abolition of child labour,** und

**Principle 6: elimination of discrimination** during recruitment and employment.

#### 2.3 Environmental protection

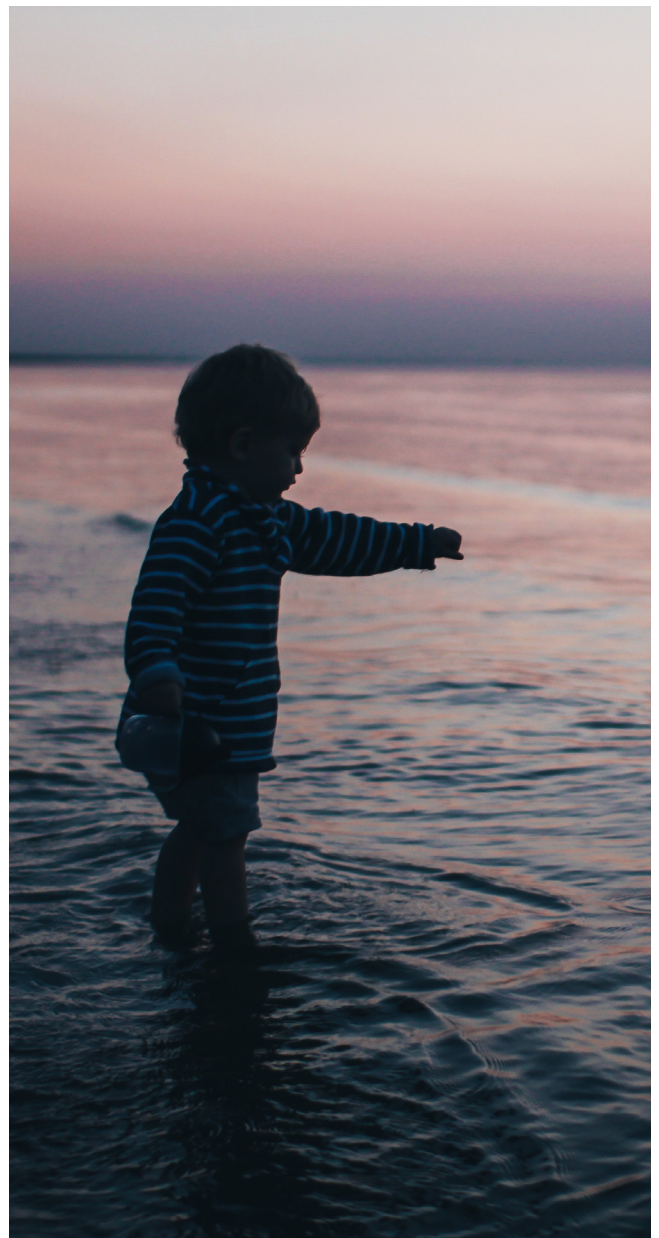
**Principle 7:** Enterprises should support a **precautionary approach** to environmental challenges,

**Principle 8:** undertake initiatives to promote **greater environmental responsibility,** and

**Principle 9:** encourage the **development and spread of environmentally friendly technologies**.

#### 2.4 Anti-corruption

**Principle 10:** Enterprises should work **against all forms of corruption,** including extortion and bribery.



### 3. Our principles in dealing with colleagues, customers and partners

#### 3.1 Proper record-keeping and financial reporting

In the framework of an internal control system, all business processes must be appropriately documented. All business partners are obliged to assist b.telligent in proper record-keeping.

This includes:

- Timely registration of performed services, as agreed in each case
- Submission of all documents for settlement of accounts with customers, as agreed in each case

Checks are required to ensure complete and correct registration of information relevant to accounting.

#### 3.2 Fair and respectable working conditions

Friendly, objective, fair and respectful dealings with colleagues and third parties are expected from every business partner. **Discrimination and harassment of any kind will not be tolerated.** Every case of discrimination or harassment is to be reported directly to the management board or human resources department. b.telligent attaches the greatest importance to immediate exposure of such cases and implementation of measures to prevent such conduct in future.

#### 3.3 Keeping of trade secrets, protection of third-party rights, data privacy

Trade secrets of b.telligent or customers may be not relayed to third parties, let alone publicized. Furthermore, the rights of third parties must be respected. By way of non-disclosure agreements (NDA) or skeleton contracts, b.telligent's business partners and service providers are informed about their obligations, including those concerning confidentiality, with respect to trade and business secrets of any kind, as well as proprietary rights of third parties, and committed bindingly to strict observance.

In accordance with the provisions of the General Data Protection Regulation (GDPR) and the Federal Data Protection Act, the business partners furthermore undertake to maintain the privacy of personal data and other data which the business partners process, store or otherwise handle within the framework of commercial transactions.

#### 3.4 Separation of corporate and private interests

All employees of business partners must always separate their private interests from those of the enterprise. Only objective criteria count, also in decisions involving staff and business relations with third parties.

#### 3.5 Cooperative dealings with authorities

The business partners must strive to maintain a cooperative relationship with all responsible authorities. Information should be made available fully, openly, on time and in a comprehensible manner.

**We hereby confirm that we have received and read the compliance policy. With our signature, we furthermore assure that we have understood, and will observe, the policy.**

\_\_\_\_\_  
Location, date

\_\_\_\_\_  
Signature

**b.telligent**

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